



Indiana Department of Environmental Management  
*We Protect Hoosiers and Our Environment.*

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

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

**NOTICE OF 30-DAY PERIOD  
FOR PUBLIC COMMENT**

Preliminary Findings Regarding a  
Federally Enforceable State Operating Permit (FESOP)  
Renewal with New Source Review

for United Transportation Group, Inc. in Lake County

Permit No.: 089-37256-00469

The Indiana Department of Environmental Management (IDEM) has received an application from United Transportation Group, Inc., located at 1150 E 145th Street, East Chicago, IN 46312, for a new source review and renewal of its FESOP, issued on July 21, 2009. If approved by IDEM's Office of Air Quality (OAQ), the proposed modification would allow United Transportation Group, Inc. (UTG) to make certain changes at its existing source. UTG has applied to add one (1) transloading operation, and to revise the existing permit limits and conditions to more closely match the operations at the source and to increase operational flexibility.

The applicant has constructed and operated new equipment that emits air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes. The potential to emit of any regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the transloading operation has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft renewal with new source review contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

East Chicago Public Library  
2401 East Columbus Drive  
East Chicago, IN 46312-2998

and IDEM Northwest Regional Office  
330 W. US Highway 30, Suites E & F  
Valparaiso, IN 46385

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

**How can you participate in this process?**

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F089-37256-00469 in all correspondence.

**Comments should be sent to:**

Hannah L. Desrosiers  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-9327  
Or dial directly: (317) 233-9327  
Fax: (317)-232-6749 attn: Hannah Desrosiers  
E-mail: [hdesrosi@idem.in.gov](mailto:hdesrosi@idem.in.gov)

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Ms. Hannah L. Desrosiers, of my staff, at the above address.



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



# Indiana Department of Environmental Management

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DRAFT

## Federally Enforceable State Operating Permit (FESOP) Renewal OFFICE OF AIR QUALITY

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

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F089-37256-00469	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary rail tank car, railcar, and truck tanker cleaning facility.

Source Address:	1150 E 145th Street, East Chicago, Indiana 46312
General Source Phone Number:	219-392-8100
SIC Code:	4789 (Transportation Services, Not Elsewhere Classified); and 4785 (Fixed Facilities and Inspection and Weighing Services for Motor Vehicle Transportation);
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

---

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

- (a) One (1) non-pressurized rail tank car cleaning operation, including one (1) cleaning bay, constructed in 1989, with a maximum throughput capacity of one (1) rail tank car per three (3) hours (equivalent to 0.33 rail tank cars per hour), uncontrolled and venting inside building B, which exhausts to vent B.
- (b) One (1) truck tanker cleaning operation, including two (2) cleaning bays, constructed in 1990, with a maximum throughput capacity of two (2) truck tankers per one (1) hour, each (equivalent to 2.0 truck tankers per hour, total), uncontrolled and venting inside building A, which exhausts to vent A.
- (c) One (1) pressurized rail tank car purging/degassing operation, including a manifold that allows up to three (3) pressurized rail tank cars to exhaust to the flare at any one time, constructed in 1990, with a maximum throughput capacity of one (1) rail tank car per two (2) hours (equivalent to 1.5 pressurized rail tank cars per hour), with VOC emissions controlled by a flare with one (1) 0.102 MMBtu/hr natural gas-fired pilot, and exhausting outside the building to stack S-1.
- (d) One (1) liquid commodity transfer facility, identified as the Transloading Operation, constructed in 1989 and permitted in 2016, handling a maximum of fifty thousand (50,000) gallons per day and filling storage tanks having a capacity equal to or less than twenty-five thousand (25,000) gallons for transferring substances, including but not limited to gasoline and methylene chloride, from one (1) cargo tank (i.e., rail tank car or truck tanker) to another cargo tank (i.e., rail tank car or truck tanker).

- (e) One (1) portable shotblasting unit, identified as PSB1, constructed prior to 2004, used to remove rust, rail tank car liners, and other undesirable material from rail tank cars, using a maximum of 1,000 pounds of grit per hour, uncontrolled and exhausting outside the building. [326 IAC 6.8]

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following specifically regulated insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
  - (1) One (1) 5.02 MMBtu/hr natural gas-fired boiler, identified as Boiler B1, constructed after September 21, 1983, used to generate steam for cleaning and facility heat, uncontrolled and exhausting outside the building. [326 IAC 6.8]
  - (2) Five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]
  - (3) Four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]
- (b) Paved roads and parking lots with public access. [326 IAC 6.8-10]
- (c) Four (4) diesel fuel dispensing facilities, identified as DFD1 through DFD4, having a combined total storage tank capacity of less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less, combined. [326 IAC 8-9-6]

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Water based activities, including activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume. [326 IAC 2-7-1(21)(J)(ix)(AA)]

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

---

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

### B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

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- (a) This permit, F089-37256-00469, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

---

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

### B.5 Severability [326 IAC 2-8-4(4)]

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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.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

---

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

---

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)]**

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit 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 Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.12 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

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- (a) All terms and conditions of permits established prior to F089-37256-00469 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating

Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.2 Opacity [326 IAC 5-1]**

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

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

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

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

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

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on

pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

### Testing Requirements [326 IAC 2-8-4(3)]

#### C.7 Performance Testing [326 IAC 3-6]

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

#### C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

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

C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.12 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);  
or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.

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

**C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:
  - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner

makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

**C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.16 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-8-4(10)]: Cleaning Operations

- (a) One (1) non-pressurized rail tank car cleaning operation, including one (1) cleaning bay, constructed in 1989, with a maximum throughput capacity of one (1) rail tank car per three (3) hours (equivalent to 0.33 rail tank cars per hour), uncontrolled and venting inside building B, which exhausts to vent B.
- (b) One (1) truck tanker cleaning operation, including two (2) cleaning bays, constructed in 1990, with a maximum throughput capacity of two (2) truck tankers per one (1) hour, each (equivalent to 2.0 truck tankers per hour, total), uncontrolled and venting inside building A, which exhausts to vent A.
- (c) One (1) pressurized rail tank car purging/degassing operation, including a manifold that allows up to three (3) pressurized rail tank cars to exhaust to the flare at any one time, constructed in 1990, with a maximum throughput capacity of one (1) rail tank car per two (2) hours (equivalent to 1.5 pressurized rail tank cars per hour), with VOC emissions controlled by a flare with one (1) 0.102 MMBtu/hr natural gas-fired pilot, and exhausting outside the building to stack S-1.
- (d) One (1) liquid commodity transfer facility, identified as the Transloading Operation, constructed in 1989 and permitted in 2016, handling a maximum of fifty thousand (50,000) gallons per day and filling storage tanks having a capacity equal to or less than twenty-five thousand (25,000) gallons for transferring substances, including but not limited to gasoline and methylene chloride, from one (1) cargo tank (i.e., rail tank car or truck tanker) to another cargo tank (i.e., rail tank car or truck tanker).

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

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

#### D.1.1 Combustion Limitation [40 CFR 63, Subpart EEE][326 IAC 20-28]

In order to render the requirements of 40 CFR 63, Subpart EEE (NESHAPs for Hazardous Waste Combustors) and 326 IAC 20-28 not applicable, the Permittee shall not combust hazardous waste, as defined under 40 CFR 261.3, in the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation flare, or each of the non-pressurized rail tank car and truck tanker liquid and dry heel removal stations.

Compliance with this requirement shall render the requirements of 40 CFR 63, Subpart EEE, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Waste Combustors and 326 IAC 20-28 not applicable.

#### D.1.2 Emission Offset Minor and FESOP Limits: Volatile Organic Compounds (VOC) [326 IAC 2-8][326 IAC 2-3][326 IAC 8-7]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) not applicable, the Permittee shall comply with the following:

- (a) VOC emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) For the purpose of this permit, the term "Waste Flammable Liquids" means the residue from a rail tank car or truck tanker that last contained a liquid with a flashpoint less than

140 degrees Fahrenheit (°F) and includes but is not limited to fuels blended from various types of liquid wastes, waste solvents, and other waste organic liquids.

Compliance with these requirements, combined with the potential to emit VOCs from all other emission units at the source, shall limit the source-wide total potential VOC emissions to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), not applicable.

**D.1.3 FESOP Limits: Hazardous Air Pollutants (HAPs) [326 IAC 2-8]**

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Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (a) Total combined HAPs emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Total individual (any single) HAP emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

**D.1.4 Particulate Emission Limitations [326 IAC 6.8-1-2]**

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Pursuant to 326 IAC 6.8-1-2, the particulate emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, shall not exceed 0.03 grains per dry standard cubic foot (dscf), each.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

**Compliance Determination Requirements [326 IAC 2-8-4(1)]**

**D.1.6 Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Control**

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In order to assure compliance with Conditions D.1.2(a), D.1.3(a), and D.1.3(b), the Permittee shall comply with the following:

- (a) The flare serving the pressurized rail tank car purging/degassing operation shall be in operation and control VOC and HAP emissions from the pressurized rail tank car purging/degassing operation at all times that the pressurized rail tank car purging/degassing operation is purging/degassing rail tank cars.
- (b) The flare shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications; and

For the purpose of this condition, "operation of the flare" shall mean the continuous presence of a pilot flame or equivalent.

### D.1.7 Flare Testing

In order to demonstrate compliance with Conditions D.1.2(a), D.1.3(a), and D.1.3(b), the Permittee shall perform VOC and HAP testing (after control) at the outlet exhaust of the flare used to control emissions from the pressurized rail tank car purging/degassing operation (including capture efficiency and destruction efficiency) not later than five (5) years from the most recent valid compliance demonstration, utilizing methods approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

### D.1.8 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP limitations contained in Conditions D.1.2(a), D.1.3(a), and D.1.3(b), shall be determined as follows:

- (a) Except as otherwise specified in Condition D.1.8(f), compliance with the VOC and HAP limitations in the permit shall be determined using the following equation:

$$E_{TOT} = \sum_{m=1}^{12} (E_{NPR} + E_{TT} + E_{PR} + E_{TO})_m$$

Where:

$E_{TOT}$  = Total Volatile organic compound (VOC), Total Hazardous Air Pollutants (HAP), or Highest Single Hazardous Air Pollutant (HAP) emissions (tons) from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, for a 12 consecutive month period (tons/12-months).

$E_{NPR}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation (tons/month), as calculated in subsection (b), below.

$E_{TT}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the truck tanker cleaning operation (tons/month), as calculated in subsection (c), below.

$E_{PR}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the pressurized rail tank car purging/degassing operation controlled by the flare (tons/month), as calculated in subsection (d), below.

$E_{TO}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the transloading operation (tons/month), as calculated in subsection (e), below.

$m$  = Each month in 12 consecutive month period.

- (b) Except as otherwise specified in Condition D.1.8(f), total VOC, Total HAP, and Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation shall be calculated using the following equation:

$$E_{NPR} = \sum_{y=1}^Y \left[ \left( \sum_{l=1}^L \frac{W_l}{2000 \text{ lbs/ton}} \right) + \left( \sum_{s=1}^S \frac{W_s}{2000 \text{ lbs/ton}} \right) \right]$$

Where:

$E_{NPR}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation (tons/month).

$Y$  = Total VOC, Total HAP, or Highest Single HAP.

- y = Each Individual VOC or HAP.
- L = Total number of non-pressurized rail tank cars processed in a month that contained a List 1 substance.
- I = Each non-pressurized rail tank car processed in a month that contained a List 1 substance.
- W<sub>l</sub> = List 1 substance specific reporting value (lbs/rail tank car). The reporting values for the List 1 substances are as follows:
- Methanol: 36 pounds per rail tank car.
  - Waste Flammable Liquids: 26.0 pound per rail tank car.
  - Gasoline, gasoline additives, and naphtha: 16 pounds per rail tank car.
  - Methylene chloride: 8.0 pounds per rail tank car.
  - Dichlorobenzene: 3.0 pounds per rail tank car.
  - Butyl acetate, vinyl acetate, glycols, glycol ethers, glycerin, and formaldehyde: 2.0 pounds per rail tank car.
  - Ethyl acetate, ethanol, furfuryl alcohol: 1.5 pound per rail tank car.
  - Toluene, xylene, diesel, mineral spirits, methyl ethyl ketone, heptane, hexane, styrene, isopropyl alcohol: 1.0 pound per rail tank car.
  - Residues of petroleum products (except gasoline), including but not limited to crude oil, asphalt, diesel fuel, kerosene, and motor oil: 1.0 pound per rail tank car.
  - Surfactants, herbicides, pesticides: 0.2 pound per rail tank car.
  - Vegetable oils, waxes, soap, and mineral oil result in no VOC or HAP emissions.
- S = Total non-pressurized rail tank cars processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.
- s = Each non-pressurized rail tank car processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.
- W<sub>s</sub> = A substance specific reporting value for each VOC or HAP containing substances that was not a List 1 substance shall be 1.0 pound per rail tank car, or shall be calculated assuming that substance vapor concentration is 10% of the lower explosive limit (LEL) using the following equation:

$$W_s = \frac{\left(\frac{LEL_s}{1000}\right) * V * 760 * MW_s}{998.9 * 293.15}$$

Where:

- LEL<sub>s</sub> = Lower explosive limit (LEL) of substance (expressed as a percentage).
- 1000 = Factor to convert to 10% of the LEL.
- V = Volume of non-pressurized rail tank car (ft<sup>3</sup>).
- 760 = Standard pressure (760 mmHg).
- MW<sub>s</sub> = Molecular weight of substance (lb/lbmole).
- 998.9 = Ideal Gas Law Constant (998.9 mmHg- ft<sup>3</sup>/lbmole-K).
- 293.15 = Standard temperature (293.15 K).

Calculated W<sub>s</sub> values of less than 0.001 shall be reported as 0.001.

- (c) Except as otherwise specified in Condition D.1.8(f), total VOC, Total HAP, and Highest Single HAP emissions from the truck tanker cleaning operation shall be calculated using the following equation:

$$E_{TT} = \sum_{y=1}^Y \left[ \left( \sum_{l=1}^L \frac{W_l}{2000 \text{ lbs/ton}} \right) + \left( \sum_{s=1}^S \frac{W_s}{2000 \text{ lbs/ton}} \right) \right]$$

Where:

- $E_{TT}$  = Total VOC or HAP emissions from the truck tanker cleaning operation (tons/month).
- $Y$  = Total VOC, Total HAP, or Highest Single HAP.
- $y$  = Each Individual VOC or HAP.
- $L$  = Total number of truck tankers processed in a month that contained a List 1 substance.
- $l$  = Each truck tanker processed in a month that contained a List 1 substance.
- $W_l$  = List 1 substance specific reporting value (lbs/truck tanker). The reporting values for the List 1 substances are as follows:
- Methanol: 10.4 pounds per truck tanker.
  - Waste Flammable Liquids: 7.3 pounds per truck tanker.
  - Gasoline, gasoline additives, and naphtha: 4.6 pounds per truck tanker.
  - Methylene chloride: 2.5 pounds per truck tanker.
  - Dichlorobenzene: 1.0 pound per truck tanker.
  - Butyl acetate, vinyl acetate, glycols, glycol ethers, glycerin, and formaldehyde: 0.6 pound per truck tanker.
  - Ethyl acetate, ethanol, furfuryl alcohol: 0.5 pound per truck tanker.
  - Toluene, xylene, diesel, mineral spirits, methyl ethyl ketone, heptane, hexane, styrene, isopropyl alcohol: 0.3 pound per truck tanker.
  - Residues of petroleum products (except gasoline), including but not limited to crude oil, asphalt, diesel fuel, kerosene, and motor oil: 0.25 pound per truck tanker.
  - Surfactants, herbicides, pesticides: 0.05 pound per truck tanker.
  - Vegetable oils, waxes, soap, and mineral oil result in no VOC or HAP emissions.
- $S$  = Total truck tankers processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.
- $s$  = Each truck tanker processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.
- $W_s$  = A substance specific reporting value for each VOC or HAP containing substances that was not a List 1 substance shall be 0.3 pounds per truck tanker, or shall be calculated assuming that substance vapor concentration is 10% of the lower explosive limit (LEL) using the following equation:

$$W_s = \frac{\left( \frac{LEL_s}{1000} \right) * V * 760 * MW_s}{998.9 * 293.15}$$

Where:

- $LEL_s$  = Lower explosive limit (LEL) of substance (expressed as a percentage).
- 1000 = Factor to convert to 10% of the LEL.
- $V$  = Volume of truck tanker ( $ft^3$ ).

- 760 = Standard pressure (760 mmHg).
- MW<sub>s</sub> = Molecular weight of substance (lb/lbmole).
- 998.9 = Ideal Gas Law Constant (998.9 mmHg- ft<sup>3</sup>/lbmole-K).
- 293.15 = Standard temperature (293.15 K).

Calculated W<sub>s</sub> values of less than 0.001 shall be reported as 0.001.

- (d) Except as otherwise specified in Condition D.1.8(f), total VOC, Total HAP, and Highest Single HAP emissions from the pressurized rail tank car purging/degassing operation controlled by the flare shall be calculated using the following equation:

$$E_{PR} = \sum_{r=1}^R \frac{F * H_r}{2000 \text{ lbs/ton}}$$

Where:

- E<sub>PR</sub> = Total VOC, Total HAP, or Highest Single HAP emissions from the pressurized rail tank car purging/degassing operation controlled by the flare (tons/month).
- R = Total number of pressurized rail tank cars processed in a month.
- r = Each pressurized rail tank car processed in a month.
- F = Source specific emission rate for the pressurized rail tank car purging/degassing operation controlled by the flare at the flare outlet exhaust established during most recent valid stack test.  
 Until superseded by the most recent valid stack test, the emission rate of 0.51 pounds VOC or HAP per hour for the pressurized rail tank car purging/degassing operation controlled by the flare at the flare outlet exhaust that was established in the 2012 stack test shall be used.
- H<sub>r</sub> = Total time spent purging/degassing each pressurized rail tank cars to the flare (hours).

- (e) Except as otherwise specified in Condition D.1.8(f), total VOC, Total HAP, and Highest Single HAP emissions from the transloading operation shall be calculated using the following equation:

$$E_{TO} = \sum_{x=1}^X \left( \frac{12.46 * S_i * P_i * M_i * G_i}{T_i * \left(1000 \frac{\text{gallons}}{\text{kgal}}\right) * (2000 \text{ lbs/ton})} \right)_x$$

Where:

- E<sub>TO</sub> = Total VOC, Total HAP, or Highest Single HAP emissions from the transloading operation (tons/month).
- X = Total number of rail tank cars or tanker trailers transloaded in a month.
- x = Each rail tank car or tanker trailer transloaded in a month.
- 12.46 = Factor to convert to units of lb/kgal of liquid loaded.
- i = Each specific liquid transloaded in a month.
- S<sub>i</sub> = Saturation factor for type of liquid loading (AP 42, Table 5.2-1)
- P<sub>i</sub> = True vapor pressure of liquid loaded (psia) from AP 42, Table 7.1-2 (or other valid source of chemical data)
- M<sub>i</sub> = Average molecular weight of Total VOC, Total HAP, or Highest Single HAP vapors (lb/lb-mole) emitted from specific liquid loaded (AP 42, Table 7.1-2 or other source of chemical data)

- $T_i$  = Temperature of liquid loaded °R (°F + 460)  
 $G_i$  = Total volume of liquid loaded into each rail tank car or tanker trailer (gallons).

- (f) As an alternative to calculating Highest Single HAP emissions using the equations in Conditions D.1.8(a) through D.1.8(e), the Permittee may determine compliance with the Single HAP emission limitation in Condition D.1.3(b) using the Total HAP emissions for any month that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period.

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

#### **D.1.9 Parametric Monitoring**

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In order to assure compliance with Conditions D.1.6, the Permittee shall comply with the following:

- (a) A presence of flame detection device, such as an ultraviolet beam sensor, a thermocouple, a flame ionization detector, or other equivalent device, shall be installed at the pilot light or the flame itself to indicate the continuous presence of a flame, and shall be calibrated, maintained, and operated in conjunction with the flare according to the manufacturer's specifications.
- (b) The flare shall be monitored to detect the presence of a flame while the pressurized rail tank car purging/degassing operation is in operation; and
- (c) The total amount of elapsed time per each occurrence that the pressurized rail tank car purging/degassing operation is vented to the flare shall be recorded.

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

#### **D.1.10 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.2(a), D.1.3(a), D.1.3(b), and D.1.8, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Conditions D.1.2(a), D.1.3(a), and D.1.3(b).
- (1) Calendar dates covered in the compliance determination period.
- (2) Data and parameter values used in the calculations required by Condition D.1.8, including the following:
- (A) The types of substances/materials/liquids processed each month in the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the types, VOC content, and HAP content of substances/materials/liquids processed.
- (B) Total number of non-pressurized rail tank cars and truck tankers processed each month that contained a List 1 substance specified in D.1.8(b) and D.1.8(c).
- (C) Total number of non-pressurized rail tank cars and truck tankers processed each month that contained a VOC or HAP containing substance that was not a List 1 substance specified in D.1.8(b) and D.1.8(c).

- (D) The substance specific reporting value used for each VOC and HAP containing substances processed each month, including any supporting calculations and parameter values as specified in D.1.8(b) and D.1.8(c).
- (E) Total number of pressurized rail tank cars processed in a month.
- (F) Total hours spent purging/degassing each pressurized rail tank car to the flare each month.
- (E) Total number of rail tank cars or tanker trailers transloaded each month.
- (G) Total gallons of each liquid transloaded each month.
- (3) The Total VOC and Total HAP emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, each month and each compliance period.
- (4) The Permittee shall maintain records of the Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, each month and each compliance period for any month that the Total HAP emissions exceed 9.5 tons per twelve (12) consecutive month period.
- (5) The Permittee is not required to maintain records of the Highest Single HAP emissions for that month and for that compliance period for any month that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period.
- (b) To document the compliance status with Conditions D.1.6 and D.1.9, the Permittee shall maintain the following records for the pressurized rail tank car purging/degassing operation flare:
  - (1) Copies of the manufacturer's specifications for the flare and presence of flame detection device.
  - (2) Calibration data and maintenance records for the flare and presence of flame detection device.
  - (3) Presence of flame readings for the presence of flame detection device. The Permittee shall include in its record when a presence of flame reading is not taken and the reason for the lack of a presence of flame reading (e.g., the unit was down for maintenance).
  - (4) The start and stop times for each pressurized rail tank car venting to the flare, sufficient to establish the total time spent purging/degassing each pressurized rail tank car to the flare (hours).
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

#### D.1.11 Reporting Requirements

The Permittee shall comply with the following reporting requirements:

- (a) Quarterly summaries of the information to document the compliance status with the Total VOC and Total HAP emission limitations in Conditions D.1.2(a), D.1.3(a), and Condition

D.1.8, shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A quarterly summary of the information to document the compliance status with the Highest Single HAP emission limitation in Condition D.1.3(b) and Condition D.1.8, shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. For any compliance period that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period, the Permittee may specify in the quarterly summary that the Total HAP emissions were less than or equal to 9.5 tons per twelve (12) month period as an alternative to specifying the Highest Single HAP emissions. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-8-4(10)]: Shotblasting

- (e) One (1) portable shotblasting unit, identified as PSB1, constructed prior to 2004, used to remove rust, rail tank car liners, and other undesirable material from rail tank cars, using a maximum of 1,000 pounds of grit per hour, uncontrolled and exhausting outside the building. [326 IAC 6.8]

### Specifically Regulated insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
- (1) One (1) 5.02 MMBtu/hr natural gas-fired boiler, identified as Boiler B1, constructed after September 21, 1983, used to generate steam for cleaning and facility heat-, uncontrolled and exhausting outside the building. [326 IAC 6.8]
  - (2) Five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]
  - (3) Four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]
- (b) Paved roads and parking lots with public access. [326 IAC 6-8.10]
- (c) Four (4) diesel fuel dispensing facilities, identified as DFD1 through DFD4, having a combined total storage tank capacity of less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less, combined. [326 IAC 8-9-6]

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

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

#### D.2.1 Particulate Emission Limitations [326 IAC 6.8-11]

In order to render the requirements of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures) not applicable, the Permittee shall comply with the following:

- (a) Operation of the portable shotblasting unit (PSB1) shall not exceed 2,675 hours per twelve (12) consecutive month period, with compliance determined at the end of each month; and
- (b) PM10 emissions from the portable shotblasting unit (PSB1) shall not exceed 7.00 pounds per hour (lbs/hr).

Compliance with these limits, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than ten (10) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures) not applicable.

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

- (a) Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the portable shotblasting unit (PSB1) and associated and spent media cleanout shall not exceed 0.03 grains per dry standard cubic foot (dscf).

- (b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate emissions from the 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1) shall not exceed 0.01 grains per dry standard cubic foot (dscf).
- (c) Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the five (5) direct-fired HVAC units and four (4) direct-fired heaters, shall not exceed 0.03 grains per dry standard cubic foot (dscf), each.

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

**D.2.3 Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 8-9]**

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- (a) To document the compliance status with Condition D.2.1(a), the Permittee shall maintain monthly records of the hours of operation of the portable shotblasting unit (PSB1).
- (b) Pursuant to 326 IAC 8-9-6(a), records required by subsection (b) shall be maintained for the life of the vessel.
- (c) Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record and submit to the department a report, for the diesel fuel storage tanks, containing the following information for the vessel:
  - (1) The vessel identification number.
  - (2) The vessel dimensions.
  - (3) The vessel capacity.
- (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**D.2.4 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Condition D.2.1(a), shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: United Transportation Group, Inc.  
Source Address: 1150 E 145th Street, East Chicago, Indiana 46312  
FESOP Permit No.: F089-37256-00469

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: United Transportation Group, Inc.  
Source Address: 1150 E 145th Street, East Chicago, Indiana 46312  
FESOP Permit No.: F089-37256-00469

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12</li></ul> |
|--|

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report - Cleaning Operations**

Source Name: United Transportation Group  
Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312  
FESOP Permit No.: F089-37256-00469  
Facility: Non-Pressurized Rail Tank Car Cleaning Operation, Truck Tanker Cleaning Operation, Pressurized Rail Tank Car Purging/Degassing Operation, and Transloading Operation  
Parameter: Volatile Organic Compound (VOC) Emissions.  
Limit: VOC emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, pursuant to the requirements of in Condition D.1.8.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report - Cleaning Operations**

Source Name: United Transportation Group  
 Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312  
 FESOP Permit No.: F089-37256-00469  
 Facility: Non-Pressurized Rail Tank Car Cleaning Operation, Truck Tanker Cleaning Operation, Pressurized Rail Tank Car Purging/Degassing Operation, and Transloading Operation  
 Parameter: Total Combined Hazardous Air Pollutant (HAP) Emissions.  
 Limit: Total combined HAPs emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/de-gassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month pursuant to the requirements of Condition D.1.8.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Total Combined HAP Emissions (tons)	Total Combined HAP Emissions (tons)	Total Combined HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report - Cleaning Operations**

Source Name: United Transportation Group  
 Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312  
 FESOP Permit No.: F089-37256-00469  
 Facility: Non-Pressurized Rail Tank Car Cleaning Operation, Truck Tanker Cleaning Operation, Pressurized Rail Tank Car Purging/Degassing Operation, and Transloading Operation  
 Parameter: Highest Individual Hazardous Air Pollutant (HAP) Emissions.  
 Limit: Total individual (any single) HAP emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, pursuant to the requirements of Condition D.1.8.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

For any compliance period that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period, the Permittee may specify in the table below that the Total HAP emissions were less than or equal to 9.5 tons per twelve (12) month period as an alternative to specifying the Highest Single HAP emissions.

Month	Total HAP emissions were less than or equal to 9.5 tons per twelve (12) month period (Yes/No)	Individual HAP Being Reported For This Month	Column 1	Column 2	Column 1 + Column 2
			Total Individual HAP Emissions (tons)	Total Individual HAP Emissions (tons)	Total Individual HAP Emissions (tons)
			This Month	Previous 11 Months	12 Month Total

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report - Shotblasting**

Source Name: United Transportation Group  
Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312  
FESOP Permit No.: F089-37256-00469  
Facility: Portable Shotblasting Unit (PSB1)  
Parameter: Hours of Operation  
Limit: Operation of the portable shotblasting unit (PSB1) shall not exceed 2,675 hours per twelve (12) consecutive month period, with compliance determined at the end of each month.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

Source Name: United Transportation Group, Inc.  
Source Address: 1150 E 145th Street, East Chicago, Indiana 46312  
FESOP Permit No.: F089-37256-00469

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP) Renewal  
with New Source Review (NSR)**

**Source Description and Location**

<b>Source Name:</b>	United Transportation Group, Inc.
<b>Source Location:</b>	1150 E 145th Street, East Chicago, IN 46312
<b>County:</b>	Lake
<b>SIC Code:</b>	4789 (Transportation Services, Not Elsewhere Classified); and 4785 (Fixed Facilities and Inspection and Weighing Services for Motor Vehicle Transportation);
<b>Permit Renewal No.:</b>	F089-37256-00469
<b>Permit Reviewer:</b>	Hannah L. Desrosiers

The Office of Air Quality (OAQ) has reviewed the operating permit renewal with new source review (NSR) application from United Transportation Group, Inc. (UTG), submitted on June 1, 2016, relating to the modification to, and continued operation of, an existing, stationary, rail tank car and truck tank cleaning facility. On September 23, 2015, UTG submitted a FESOP Significant Permit Revision (SPR) application to revise the existing permit limits and conditions to more closely match the operations at the source and to increase operational flexibility. UTG requested that the SPR application be combined into and processed as part of this renewal.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) One (1) non-pressurized rail tank car cleaning operation, including one (1) cleaning bay, constructed in 1989, with a maximum throughput capacity of one (1) rail tank car per three (3) hours (equivalent to 0.33 rail tank cars per hour), uncontrolled and venting inside building B, which exhausts to vent B.
- (b) One (1) truck tanker cleaning operation, including two (2) cleaning bays, constructed in 1990, with a maximum throughput capacity of two (2) truck tankers per one (1) hour, each (equivalent to 2.0 truck tankers per hour, total), uncontrolled and venting inside building A, which exhausts to vent A.
- (c) One (1) pressurized rail tank car purging/degassing operation, including a manifold that allows up to three (3) pressurized rail tank cars to exhaust to the flare at any one time, constructed in 1990, with a maximum throughput capacity of one (1) rail tank car per two (2) hours (equivalent to 1.5 pressurized rail tank cars per hour), with VOC emissions controlled by a flare with one (1) 0.102 MMBtu/hr natural gas-fired pilot, and exhausting outside the building to stack S-1.
- (d) One (1) portable shotblasting unit, identified as PSB1, constructed prior to 2004, used to remove rust, rail tank car liners, and other undesirable material from rail tank cars, using a maximum of 1,000 pounds of grit per hour, uncontrolled and exhausting outside the building. [326 IAC 6.8]

### **Emission Units and Pollution Control Equipment Constructed and Operated without a Permit**

The source consists of the following unpermitted emission unit(s):

- (a) One (1) liquid commodity transfer facility, identified as the Transloading Operation, constructed in 1989 and permitted in 2016, handling a maximum of fifty thousand (50,000) gallons per day and filling storage tanks having a capacity equal to or less than twenty-five thousand (25,000) gallons for transferring substances, including but not limited to gasoline and methylene chloride, from one (1) cargo tank (i.e., rail tank car or truck tanker) to another cargo tank (i.e., rail tank car or truck tanker).

### **Emission Units and Pollution Control Equipment Removed From the Source**

No emission units have been removed from this existing source during this review process.

### **Insignificant Activities**

The source also consists of the following specifically regulated insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
  - (1) One (1) 5.02 MMBtu/hr natural gas-fired boiler, identified as Boiler B1, constructed after September 21, 1983, used to generate steam for cleaning and facility heat, uncontrolled and exhausting outside the building. [326 IAC 6.8]
  - (2) Five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]
  - (3) Four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]
- (b) Paved roads and parking lots with public access. [326 IAC 6.8-10]
- (c) Four (4) diesel fuel dispensing facilities, identified as DFD1 through DFD4, having a combined total storage tank capacity of less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less, combined. [326 IAC 8-9-6]

This stationary source also includes the following insignificant activities:

- (d) Water based activities, including activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume. [326 IAC 2-7-1(21)(J)(ix)(AA)]

### **Existing Approvals**

The source was issued FESOP Renewal No. F089-27287-00469 on July 21, 2009. There have been no subsequent approvals issued.

### **Enforcement Issues**

IDEM is aware that the transloading operation has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft renewal with new

source review contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

### Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

1. There are no AP 42 Emission Factors for cleaning non-pressurized rail tank car or truck tankers. Therefore, the ideal gas law was used to form a conservative estimate of Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) emissions.

VOC Potential Emissions ( $W_s$ ) (lbs/car) were calculated from the Ideal Gas Law as follows:

$$W_s = \frac{\left(\frac{LEL_s}{1000}\right) * V * 760 * MW_s}{989.9 * 293.15}$$

Where:

$LEL_s$  = Lower explosive limit (LEL) of substance (expressed as a percentage).

1000 = Factor to convert to 10% of the LEL.

V = Volume of non-pressurized rail tank car (ft<sup>3</sup>).

760 = Standard pressure (760 mmHg).

MWs = Molecular weight of substance (lb/lbmole).

998.9 = Ideal Gas Law Constant (998.9 mmHg- ft<sup>3</sup>/lbmole-K).

293.15 = Standard temperature (293.15 K).

The Lower explosive limit (LEL) means the minimum concentration of vapor in air below which propagation of a flame does not occur in the presence of an ignition source [29 CFR 1915.11(b)]. Furthermore, an employee may not enter a space where the concentration of flammable vapors or gases is equal to or greater than 10 percent of the lower explosive limit [29 CFR 1915.12(b)(3)], since OSHA considers concentrations in excess of 10% of the LEL to be a hazardous atmosphere in confined spaces [29 CFR 1910.146(b)], including rail tank cars and truck tankers.

For the purposes of this permit action, the LEL (percent (%) by volume of air) was taken from the NIOSH Pocket Guide to Chemical Hazards (<http://www.cdc.gov/niosh/npg/>), with the exception of the glycol ethers, diesel fuel, glycerol, and waste flammables, which were provided by the source.

Based on an in-house (onsite) study conducted by UTG November 30 through December 10 of 2015, it was noted that while a majority of the non-pressurized rail tank cars and truck tankers had no measurable VOC vapors (*i.e., well below 10% of the LEL*), that non-pressurized rail tank cars and truck tankers carrying methanol, gasoline, and waste flammable substances had vapors in excess of 100% of the LEL for those substances. Since the device used to measure the vapor concentrations in the tanks did not have the ability to measure concentrations above 100% of the LEL, to form a conservative estimate, methanol, gasoline, and waste flammables were calculated at 200% of the LEL, as follows:

$$W_G = \frac{\left(\left(\frac{LEL_s}{100}\right) * \left(\frac{200}{100}\right)\right) * V * 760 * MW_G}{989.9 * 293.15}$$

Where:

$LEL_s$  = Lower explosive limit (LEL) of substance (expressed as a percentage).

200 = Factor to convert to 200% of the LEL.

V = Volume of non-pressurized rail tank car (ft<sup>3</sup>).

760 = Standard pressure (760 mmHg).

$MW_G$  = Molecular weight of methanol, gasoline, or waste flammable substance (lb/lbmole).

998.9 = Ideal Gas Law Constant (998.9 mmHg- ft<sup>3</sup>/lbmole-K).  
293.15 = Standard temperature (293.15 K).

To simplify compliance determination, recordkeeping, and reporting, UTG has requested that HAP emissions be assumed equal to 100% of VOC emissions. IDEM is satisfied that this is a conservative estimate since not all VOCs are HAPs.

2. Emission factors for AP-42 Chapter 5.2 Transportation and Marketing of Petroleum Liquids were used to estimate evaporative Volatile Organic Compound (VOC) emissions from the draining of organic liquids from non-pressurized rail tank cars and truck tankers.
3. Process emissions from the pressurized rail tank car purging/degassing operation natural gas-assisted enclosed flare, were estimated using the source-specific emission rate established during most recent valid (2012) stack test. The testing was conducted on Rail Tank Cars being decontaminated after transporting polypropylene. An email, dated 12/10/2012, associated with the test report indicates an inbound gas flow rate of 44,000 SCFH. As many as three (3) pressurized cars can be hooked up to a manifold and exhausted to the flare at any given time.
4. Potential PM emissions from dry material handling associated with railcar cleaning have been addressed. According to UTG, typically about 500 pounds of dry materials are removed from certain hoppers as part of the cleaning process. UTG reports that it processes about 20 of these cars per year. To form a conservative estimate, since there are no emission factors available for unloading of solid residues (aka solid heel removal) from non-pressurized railcars or truck tankers, emission factors for fines screening at crushed stone processing operations (AP 42 Chapter 11.19.2, Table 11.19.2-2) were used.
5. Emission factors for AP-42 Chapter 5.2 Transportation and Marketing of petroleum products have been used to estimate Volatile Organic Compound (VOC) emissions from the transloading operations. Additionally, Hazardous Air Pollutant (HAP) emissions were estimated using a mass balance approach. According to UTG, the transloading service has been provided only a few times in the past two years. Therefore, to form a conservative estimate, the maximum throughput (gal/day) is based on a worst-case assumption of transloading 50,000 gallons per day (approx. two (2) 3,209 cubic foot non-pressurized rail tank cars per day) of gasoline or methylene chloride (MeCl). The AP-42 Chapter 5.2 Transportation and Marketing of petroleum products, equation (1), using the saturation factor for Submerged loading, dedicated service (0.6), has been used to estimate potential VOC emissions from storage tank filling, and emission factors from Table 5.2-7 - Evaporative Emissions From Gasoline Service Station Operations, were used to estimate emissions from tank breathing and emptying, and spillage. Additionally, the Hazardous Air Pollutant (HAP) content (vapor mass fraction) used to estimate HAP emissions is from the US EPA TANKS Version 4.09 program.
6. According to UTG, the only fuel dispensed onsite is about 850 gallons of diesel fuel per month. VOC and HAP emissions are determined negligible (e.g., less than a pound per year).
7. To form a conservative estimate, fugitive dust emissions from the paved roads have been calculated using the equations from AP-42, Chapter 13.2.1 (1/2011), based on 8,760 hours of use, and a silt loading of 9.7 g/m<sup>2</sup> (Iron And Steel Production Facilities), since the source is located in a highly industrial area of East Chicago (Lake County) and site-specific silt loading testing has not been performed.

**County Attainment Status**

The source is located in Lake County. The following attainment status designations are applicable to Lake County:

Pollutant	Designation
SO <sub>2</sub>	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 <sup>th</sup> 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 <sub>3</sub>	On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard. <sup>12</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective February 6, 2012, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	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 <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> 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 for the 1-hour standard. <sup>2</sup> The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228.	

*(Air Pollution Control Division; 326 IAC 1-4-46; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA; filed Oct 15, 2010, 1:51 p.m.: 20101110-IR-326100342FRA; filed Jun 7, 2012, 11:21 a.m.: 20120704-IR-326110742FRA; filed Jan 30, 2013, 12:34 p.m.: 20130227-IR-326110774FRA; filed Oct 25, 2013, 2:41 p.m.: 20131120-IR-326130164FRA)*

(a) Ozone Standards

U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake County as nonattainment for ozone. On August 1, 2012, the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against U.S. EPA in the U.S. Court of Appeals for the DC Circuit on July 19, 2012. 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 designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO<sub>x</sub> emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

Since Lake County was previously severe nonattainment for the one-hour ozone standard, UTG historically opted to limit their source-wide VOC and NO<sub>x</sub> emissions to less than 326 IAC 2-3 (Emission Offset) major source levels for a severe ozone nonattainment area (25 tons per year) and the Part 70 major source levels for a severe ozone nonattainment area (25 tons per year). Therefore, this source has never been subject to the requirements of 326 IAC 2-3 (Emission Offset) or 326 IAC 2-7 (Part 70).

(b) PM<sub>2.5</sub>

Lake County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) SO<sub>2</sub>  
On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 re-designating Lake County to attainment for sulfur dioxide standard. Therefore, SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Other Criteria Pollutants  
Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	22.95
PM <sub>10</sub>	15.78
PM <sub>2.5</sub>	15.78
SO <sub>2</sub>	0.016
NO <sub>x</sub>	2.74
VOC	310.44
CO	2.30
Total HAP	327.04
Single HAP	317.75 (MeCl)

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

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of Volatile Organic Compounds (VOCs) is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the

source's VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to this proposed renewal, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD or Appendix A of FESOP Renewal No. F089-27287-00469, issued on July 21, 2009. The notes have been modified for clarity.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to the Renewal (tons/year)								Total HAPs	Worst Single HAP
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NOx	VOC	CO			
Railcar Cleaning Operation	0.63	0.63	0.63	0.00	0.00	< 20.11 <sup>(a)</sup>	0.00	< 10 <sup>(b)</sup>	< 25 <sup>(b)</sup>	
Tank Cleaning Operation	1.8	1.8	1.8	0.00	0.00		0.00			
Railcar Purging/Degassing	0.03	0.03	0.03	0.01	1.18		4.88 <sup>(a)</sup>			0.20
Natural Gas Combustion	0.01	0.01	0.01	negl.	0.17	0.01	0.14	negl.	negl.	
Fugitive Emissions	1.63	1.63	1.63	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Total PTE of Entire Source</b>	<b>4.1</b>	<b>2.79</b>	<b>2.79</b>	<b>0.01</b>	<b>1.35</b>	<b>&lt; 25<sup>(a)</sup></b>	<b>0.34</b>	<b>&lt; 10<sup>(b)</sup></b>	<b>&lt; 25<sup>(b)</sup></b>	
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10	
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-	
Emission Offset Major Source Thresholds***	-	-	-	-	100	100	-	-	-	

negl. = negligible

\* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".

\*\* PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

\*\*\* See the "County Attainment Status" section above for more detail.

(a) Limited VOC emissions to comply with 326 IAC 2-8 (FESOP), and to render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), and 326 IAC 8-1-6 (BACT) not applicable.

(b) Limited individual and combined HAP emissions to comply with 326 IAC 2-8 (FESOP), and to render 326 IAC 2-7 (Part 70 Permits) not applicable.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because the Permittee previously accepted limits on Volatile Organic Compound (VOC) emissions to less than the Emission Offset Major Source Thresholds. Since Lake County was previously severe nonattainment for the one-hour ozone standard, UTG historically opted to limit their source-wide VOC and NOx emissions to less than 326 IAC 2-3 (Emission Offset) major source levels for a severe ozone nonattainment area (25 tons per year) and the Part 70 major source levels for a severe ozone nonattainment area (25 tons per year). Therefore, this source has never been subject to the requirements of 326 IAC 2-3 (Emission Offset) or 326 IAC 2-7 (Part 70).

- (c) This existing source is not a major source of hazardous air pollutants (HAPs), as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAP emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### Description of Proposed Revision

On September 23, 2015, UTG submitted a FESOP Significant Permit Revision (SPR) application to revise existing permit limits and conditions to more closely match the operations at the source and to increase operational flexibility. UTG requested that the SPR application be combined into and processed as part of this renewal. Additionally, upon further consideration, IDEM OAQ, in collaboration with UTG, has updated the emission unit descriptions to more closely match the operations at the source. As a result, an existing transloading operation and diesel fuel dispensing facility were discovered. These units are being added to the permit. Moreover, UTG requested that the natural gas-fired boiler (Boiler B1) rating of 0.38 MMBtu/hr be corrected to 5.02 MMBtu/hr, which UTG claimed was the actual rating of the boiler originally installed.

The following is a list of the affected existing emission unit(s) and pollution control device(s):

- (a) One (1) non-pressurized rail tank car cleaning operation, including one (1) cleaning bay, constructed in 1989, with a maximum throughput capacity of one (1) rail tank car per three (3) hours (equivalent to 0.33 rail tank cars per hour), uncontrolled and venting inside building B, which exhausts to vent B.
- (b) One (1) truck tanker cleaning operation, including two (2) cleaning bays, constructed in 1990, with a maximum throughput capacity of two (2) truck tankers per one (1) hour, each (equivalent to 2.0 truck tankers per hour, total), uncontrolled and venting inside building A, which exhausts to vent A.
- (c) One (1) pressurized rail tank car purging/degassing operation, including a manifold that allows up to three (3) pressurized rail tank cars to exhaust to the flare at any one time, constructed in 1990, with a maximum throughput capacity of one (1) rail tank car per two (2) hours (equivalent to 1.5 pressurized rail tank cars per hour), with VOC emissions controlled by a flare with one (1) 0.102 MMBtu/hr natural gas-fired pilot, and exhausting outside the building to stack S-1.

The following is a list of the affected insignificant activities:

- (d) One (1) 5.02 MMBtu/hr natural gas-fired boiler, identified as Boiler B1, constructed after September 21, 1983, used to generate steam for cleaning and facility heat, uncontrolled and exhausting outside the building. [326 IAC 6.8]

The following is the existing unpermitted emission unit and insignificant activity being added to the permit:

- (e) One (1) liquid commodity transfer facility, identified as the Transloading Operation, constructed in 1989 and permitted in 2016, handling a maximum of fifty thousand (50,000) gallons per day and filling storage tanks having a capacity equal to or less than twenty-five thousand (25,000) gallons for transferring substances, including but not limited to gasoline and methylene chloride, from one (1) cargo tank (i.e., rail tank car or truck tanker) to another cargo tank (i.e., rail tank car or truck tanker).
- (f) Four (4) diesel fuel dispensing facilities, identified as DFD1 through DFD4, having a combined total storage tank capacity of less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less, combined.

Finally, upon review of the existing permit, IDEM has determined that PSD and FESOP limits are needed for the existing shotblasting unit in order for UTG to maintain its FESOP status. See the "PTE of the Entire Source after Issuance of the Renewal" section below for more details.

*This is a new requirement for this source.*

**Permit Level Determination - FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Transloading Operation	0	0	0	0	0	60.98	0	60.98	60.98 (MeCl)
<b>Total PTE of Proposed Revision</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>60.98</b>	<b>0</b>	<b>60.98</b>	<b>60.98 (MeCl)</b>

This FESOP is being revised through a FESOP Significant Permit Revision (SPR), because the proposed revision is not an Administrative Amendment (AA) or Minor Permit Revision (MPR), and:

- (a) Pursuant to 326 IAC 2-8-11.1(f)(1)(E), the proposed revision involves the construction of new emission units where the potential to emit (PTE) of Volatile Organic Compounds (VOCs) is greater than or equal to twenty-five (25) tons per year; and
- (b) Pursuant to 326 IAC 2-8-11.1(f), the proposed revision involves adjusting FESOP, Emission Offset, and 326 IAC 8-1-6 BACT avoidance limits.

This revision is incorporated into this FESOP Renewal with New Source Review.

**PTE of the Entire Source After Issuance of the Renewal**

The table below summarizes the potential to emit of the entire source (*reflecting adjustment of existing limits*), with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Renewal (tons/year)														
	PM		PM10*		PM2.5**		SO <sub>2</sub>	NO <sub>x</sub>	VOC		CO	Total HAPs		Worst Single HAP	
<b>Non-pressurized Rail Tank car Cleaning Operation</b>	<b>0.66</b>	0.63	<b>0.16</b>	0.63	<b>0.16</b>	0.63	0	0	<b>&lt; 24.5<sup>(1)</sup></b>	<b>&lt; 20.11</b>	0	<b>&lt; 24.5<sup>(2)</sup></b>	<b>&lt; 25</b>	<b>&lt; 9.5<sup>(2)</sup></b>	<b>&lt; 10</b>
<b>Truck Tanker Cleaning Operation</b>		1.8		1.8		1.8	0	0			0				
<b>Pressurized Rail Tank car Purging/Degassing Operation (Flare)</b>	<b>0.01</b>	0.03	<b>0.01</b>	0.03	<b>0.01</b>	0.03	<b>2.63E<sup>-04</sup></b> 0.04	<b>0.04</b> 1.18		4.88	<b>0.04</b> 0.20				
<b>Transloading Operation</b>	0NC		0NC		0NC		0NC	0NC	NC	0NC	NC	NC	NC	NC	
<b>Portable Shotblasting Unit (SB1) and Spent Media Cleanout</b>	13.38		9.36		9.36		0	0	0	0	0	0	0	0	
<b>Natural Gas Combustion - Boiler B1</b>	0.041		0.016		0.016		0.013	2.16	0.12	1.81	0.041	0.039 (hexane)			
<b>Natural Gas Combustion - Insignificant HVAC Units &amp; Heaters</b>	0.010		0.041 0.04		0.041 0.04		3.22E <sup>-03</sup> negl.	0.54 0.17	0.030 0.04	0.45 0.14	0.010 negl.	0.010-negl. (hexane)			
<b>Diesel Fuel Dispensing<sup>(3)</sup></b>	0		0		0		0	0	negl.	0	negl.	negl.			
<b>Total PTE of Entire Source</b>	<b>14.09</b> 4.4		<b>9.74</b> 2.79		<b>9.74</b> 2.79		<b>0.016</b> 0.04	<b>2.74</b> 1.35	<b>24.65</b> < 25	<b>2.30</b> 0.34	<b>24.55</b> < 25	<b>9.55 (any)</b> < 10			
<b>Fugitive Emissions (paved roads)</b>	1.11 1.63		0.22 1.63		0.05 1.63		0	0	0	0	0	n/a			
<b>Total PTE of Entire Source, incl. fugitives</b>	<b>15.20</b>		<b>9.96</b>		<b>9.79</b>		<b>0.016</b>	<b>2.74</b>	<b>24.65</b>	<b>2.30</b>	<b>24.55</b>	<b>9.55 (any)</b>			
<b>Title V Major Source Thresholds</b>	-		100		100		100	100	100	100	25	10			
<b>PSD Major Source Thresholds</b>	250		250		250		250	250	250	250	-	-			
<b>Emission Offset/ Nonattainment NSR Major Source Thresholds***</b>	-		-		-		-	100	100	-	-	-			

NC = not previously characterized    negl. = negligible    incl. = including    n/a = not applicable

\*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".

\*\* PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

\*\*\* See the "County Attainment Status" section above for more detail.

- (1) Limited PTE to assure compliance with the requirements of 326 IAC 2-8 (FESOP), and render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) not applicable.
- (2) Limited PTE to assure compliance with the requirements of 326 IAC 2-8 (FESOP), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.
- (3) The Diesel Fuel Dispensing potential emissions have been evaluated using the US EPA TANKS Program (version 4.09) and determined negligible.

The table below summarizes the potential to emit of the entire source after issuance of the renewal, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Renewal (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Non-pressurized Rail Tank car Cleaning Operation	0.66	0.16	0.16	0	0	< 24.5 <sup>(1)</sup>	0	< 24.5 <sup>(2)</sup>	< 9.5 <sup>(2)</sup> (any)
Truck Tanker Cleaning Operation				0	0		0		
Pressurized Rail Tank Car Purging/Degassing Operation (Flare)	0.01	0.01	0.01	2.63E <sup>-04</sup>	0.04		0.04		
Transloading Operation	0	0	0	0	0		0		
Portable Shotblasting Unit (SB1) and Spent Media Cleanout	13.38	9.36	9.36	0	0	0	0	0	0
Natural Gas Combustion - Boiler B1	0.041	0.016	0.016	0.013	2.16	0.12	1.81	0.041	0.039 (hexane)
Natural Gas Combustion - Insignificant HVAC Units & Heaters	0.010	0.041	0.041	3.22E <sup>-03</sup>	0.54	0.030	0.45	0.010	0.010 (hexane)
Diesel Fuel Dispensing <sup>(3)</sup>	0	0	0	0	0	negl.	0	negl.	negl.
<b>Total PTE of Entire Source</b>	<b>14.09</b>	<b>9.74</b>	<b>9.74</b>	<b>0.016</b>	<b>2.74</b>	<b>24.65</b>	<b>2.30</b>	<b>24.55</b>	<b>9.55 (any)</b>
Fugitive Emissions (paved roads)	1.11	0.22	0.05	0	0	0	0	0	n/a
<b>Total PTE of Entire Source, incl. fugitives</b>	<b>15.20</b>	<b>9.96</b>	<b>9.79</b>	<b>0.016</b>	<b>2.74</b>	<b>24.65</b>	<b>2.30</b>	<b>24.55</b>	<b>9.55 (any)</b>
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
Emission Offset/ Nonattainment NSR Major Source Thresholds***	-	-	-	-	100	100	-	-	-

NC = not previously characterized    negl. = negligible    incl. = including    n/a = not applicable  
 \*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".  
 \*\* PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 \*\*\* See the "County Attainment Status" section above for more detail.  
 (1) Limited PTE to assure compliance with the requirements of 326 IAC 2-8 (FESOP), and render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) not applicable.  
 (2) Limited PTE to assure compliance with the requirements of 326 IAC 2-8 (FESOP), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.  
 (3) The Diesel Fuel Dispensing potential emissions have been evaluated using the US EPA TANKS Program (version 4.09) and determined negligible.

PSD Minor, Emission Offset Minor, and FESOP Status

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants, and HAPs from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

(a) Volatile Organic Compounds (VOCs)

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-3 (Emission Offset) not applicable, the source shall comply with the following:

- (1) VOC emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

***This is a revised limit. This is a change from the following limits:***

- (A) ***The total number of tank trucks, containing volatile organic compounds (VOC), cleaned at the source shall not exceed 2,960 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing VOC cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on emissions of 46.5 pounds VOC per railcar and 13.6 pounds VOC per tank truck cleaned.***
- (B) ***The source shall not clean any tank trucks or non-pressurized railcars that contain a VOC with a vapor pressure greater than 30 mm Hg at 25°C.***
- (C) ***VOC/HAP emissions from the Pressurized Railcar Purging/Degassing operation shall not exceed 4.88 tons per twelve consecutive month period, with compliance determined at the end of each month; and***
- (D) ***The source shall not clean any pressurized railcars that contain a VOC/HAP with a vapor pressure greater than 95 mm Hg at 25°C.***

***This change is intended to increase the operational flexibility of the source.***

- (2) For the purpose of this permit, the term "Waste Flammable Liquids" means the residue from a rail tank car or truck tanker that last contained a liquid with a flashpoint less than 140 degrees Fahrenheit (°F) and includes but is not limited to fuels blended from various types of liquid wastes, waste solvents, and other waste organic liquids.

***This is a new requirement for this source.***

Compliance with these limits, combined with the potential to emit VOCs from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-3 (Emission Offset) not applicable.

*Note: Since actual VOC emissions are dependent on the type and physical properties of the residual organic chemical being removed from the rail tank cars and/or truck tankers, and in order to provide maximum operational flexibility, compliance with the above listed VOC limits will be determined using the equations listed in the "Compliance Determination, Monitoring and Testing Requirements" section, below.*

(b) Hazardous Air Pollutants (HAPs)

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the source shall comply with the following:

- (1) Total combined HAPs emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) Total individual (any single) HAP emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

***These are revised limits. This is a change from the following limits:***

- (A) ***The total number of tank trucks, containing any hazardous air pollutant (HAP), cleaned at the source shall not exceed 750 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing any single HAP cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on maximum emissions of 46.5 pounds HAP per railcar and 13.6 pounds HAP per tank truck cleaned.***
- (B) ***The source shall not clean any tank trucks or non-pressurized railcars that contain a HAP with a vapor pressure greater than 30 mm Hg at 25°C.***
- (C) ***VOC/HAP emissions from the Pressurized Railcar Purging/Degassing operation shall not exceed 4.88 tons per twelve consecutive month period, with compliance determined at the end of each month; and***
- (D) ***The source shall not clean any pressurized railcars that contain a VOC/HAP with a vapor pressure greater than 95 mm Hg at 25°C.***

***This change is intended to increase the operational flexibility of the source.***

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

*Note: Since actual HAP emissions are dependent on the type and physical properties of the residual organic chemical being removed from the rail tank cars and/or truck tankers, and in order to provide maximum operational flexibility, compliance with the above listed HAP limits will be determined using the equations listed in the "Compliance Determination, Monitoring and Testing Requirements" section, below:*

<b>Federal Rule Applicability Determination</b>
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**Compliance Assurance Monitoring (CAM)**

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

**New Source Performance Standards (NSPS)**

- (b) 40 CFR 60, Subpart D - Standards for Fossil-Fuel-Fired Steam Generators
- (1) The requirements of the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators, 40 CFR 60, Subpart D (326 IAC 12), are not included in the permit for the 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), since although the boiler was constructed after August 17, 1971 and fires natural gas, the heat input capacity from the fuel combusted in the boiler is less than 250 million Btu per hour.
- (2) The requirements of the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators, 40 CFR 60, Subpart D (326 IAC 12), are not included in the permit for the five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, because each unit is a direct-fired heater and not a fossil fuel-fired steam generating unit, as defined in 40 CFR 60.41.
- (c) 40 CFR 60, Subpart Da - Standards for Electric Utility Steam Generating Units
- (1) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units, 40 CFR 60, Subpart Da (326 IAC 12), are not included in the permit for the 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), since although the boiler was constructed after September 18, 1978, the heat input capacity from fuel combusted in the boiler is less than 250 million Btu per hour.
- (2) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units, 40 CFR 60, Subpart Da (326 IAC 12), are not included in the permit for the five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, because each unit is a direct-fired heater and not an electric utility steam generating unit, as defined in 40 CFR 60.41Da.
- (d) 40 CFR 60, Subpart Db - Standards for Industrial-Commercial-Institutional Steam Generating
- (1) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating, 40 CFR 60, Subpart Db (326 IAC 12), are not included in the permit for the 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), since although the boiler was constructed after June 19, 1984, the heat input capacity from fuel combusted in the boiler is less than 100 million Btu per hour.

- (2) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating, 40 CFR 60, Subpart Db (326 IAC 12), are not included in the permit for the five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, because each unit is a direct-fired heater and not a steam generating unit, as defined in 40 CFR 60.41b.
- (e) 40 CFR 60, Subpart Dc - Standards for Small Industrial-Commercial-Institutional Steam Generating Units
- (1) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the one (1) 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), since although the unit combusts fuel to heat water, the maximum design heat input capacity of the unit is less than the applicability threshold of ten (10) MMBtu/hr.
- (2) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, because each unit is a direct-fired heater and not a steam generating unit, as defined in 40 CFR 60.41c.
- (f) The requirements of the following New Source Performance Standards (NSPS) are not included in the permit, since the pressurized rail tank car purging/degassing operation flare is not considered a boiler, a municipal waste combustor, or hospital/medical/infectious waste incinerator, as follows.
- (1) 40 CFR 60, Subpart D - Standards for Fossil-Fuel-Fired Steam Generators (326 IAC 12).
- (2) 40 CFR 60, Subpart Da - Standards for Electric Utility Steam Generating Units (326 IAC 12).
- (3) 40 CFR 60, Subpart Db - Standards for Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12).
- (4) 40 CFR 60, Subpart Dc - Standards for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12).
- (5) 40 CFR 60, Subpart E - Standards for Incinerators (326 IAC 12)
- (6) 40 CFR 60, Subpart Ea - Standards for Large Municipal Waste Combustors for Which Construction is Commenced after December 20, 1989 and on or before September 20, 1994 (326 IAC 12)
- (7) 40 CFR 60, Subpart Eb - Standards for Large Municipal Waste Combustors for Which Construction is Commenced after September 20, 1994, or for Which Modification or Reconstruction is commenced after June 19, 1996 (326 IAC 12)
- (8) 40 CFR 60, Subpart Ec - Standards for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced after January 20, 1996 (326 IAC 12)
- (9) 40 CFR 60, Subpart AAAA - Standards for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 (326 IAC 12)
- (10) 40 CFR 60, Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001 (326 IAC 12)
- Under 40 CFR 60.2265, the definition of solid waste includes discarded material, including contained gaseous material, resulting from industrial, commercial, mining,

agricultural operations, and from community activities. Residual liquid organic chemicals, residual inorganic chemical solutions/slurries, and residual solid materials within the rail tank cars will be drained/removed and collected in drums that will be sent off-site for re-use or disposal, with the pressurized rail tank car purging/degassing operation flare used as a pollution control device to combust residual organic vapors from the rail tank cars. For the residual pressurized gases, the rail tank car cleaning operation will not combust "contained gaseous materials" as defined by 40 CFR 60.2265, because the organic gases combusted are not in a container that is also combusted.

- (11) 40 CFR 60, Subpart DDDD - Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units (326 IAC 12)
- (12) 40 CFR 60, Subpart EEEE - Standards for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004 or for Which Modification or Reconstruction is commenced on or After June 16, 2006 (326 IAC 12)

Under 40 CFR 60.2977, the definition of solid waste includes discarded material, including contained gaseous material, resulting from industrial, commercial, mining, agricultural operations, and from community activities. Residual liquid organic chemicals, residual inorganic chemical solutions/slurries, and residual solid materials within the rail tank cars will be drained/removed and collected in drums that will be sent off-site for re-use or disposal, with the pressurized rail tank car purging/degassing operation flare used as a pollution control device to combust residual organic vapors in the rail tank cars. For the residual organic gases, the rail tank car cleaning operation will not combust "contained gaseous materials" as defined by 40 CFR 60.2977, because the organic gases combusted are not in a container that is also combusted.

- (g) 40 CFR Part 60, Subpart K - NSPS for Volatile Organic Liquid Storage Vessels
  - (1) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart K (326 IAC 12), are not included in the permit for the liquid commodity transfer facility (Transloading Operation), since each of the rail tank cars serviced by UTG have has a storage capacity less than 151,412 liters (40,000 gallons).
  - (2) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart K (326 IAC 12), are not included in the permit for the four (4) diesel fuel storage tanks, associated with diesel fuel dispensing facilities DFD1 through DFD4, since each tank was constructed after the rule applicability date of May 19, 1978 and has a maximum storage capacity of less than 151,416 liters (40,000 gallons).
- (h) 40 CFR Part 60, Subpart Ka - NSPS for Volatile Organic Liquid Storage Vessels
  - (1) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Ka (326 IAC 12), are not included in the permit for the liquid commodity transfer facility (Transloading Operation), since each of the rail tank cars serviced by UTG have has a storage capacity less than 151,412 liters (40,000 gallons).
  - (2) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Ka (326 IAC 12), are not included in the permit for the four (4) diesel fuel storage tanks, associated with diesel fuel dispensing facilities DFD1 through DFD4, since although each tank was constructed after the rule applicability date of May 18, 1978, the maximum storage capacity of each tank is less than 151,416 liters (40,000 gallons).

- (i) 40 CFR 60, Subpart Kb - NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
- (1) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit for the liquid commodity transfer facility (Transloading Operation), since although each tank was constructed after the rule applicability date of July 23, 1984, and each tank has a maximum storage capacity of greater than 75 m<sup>3</sup> (19,813 gallons) but less than 151 m<sup>3</sup> (39,890 gallons), and at times will store liquids having a maximum true vapor pressure of fifteen kiloPascals (15.0 kPa) or greater, railcars are specifically exempted from the rule under 40 CFR 60.110b(d)(3).
  - (2) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit for the four (4) diesel fuel storage tanks, associated with diesel fuel dispensing facilities DFD1 through DFD4, since although each tank was constructed after the rule applicability date of July 23, 1984, each tank has a maximum storage capacity of less than seventy-five cubic meters (75 m<sup>3</sup>) (19,813 gallons) and the liquid stored in each tank has a maximum true vapor pressure of less than fifteen kiloPascals (15.0 kPa).
- (j) 40 CFR 60, Subpart O - NSPS for Sewage Treatment Plants
- (1) The requirements of the New Source Performance Standard for Sewage Treatment Plants, 40 CFR 60, Subpart O (326 IAC 12), are not included in the permit for the pressurized rail tank car purging/degassing operation flare, since the pressurized rail tank car purging/degassing operation flare is used as a pollution control device to combust residual organic vapors from the rail tank cars, and not wastes containing more than 10 percent sewage sludge (dry basis) produced by municipal sewage treatment plants.
  - (2) The requirements of the New Source Performance Standard for Sewage Treatment Plants, 40 CFR 60, Subpart O (326 IAC 12), are not included in the permit for the wastewater [pre] treatment facility, since the unit does not include combustion of wastes containing more than 10 percent sewage sludge (dry basis) produced by municipal sewage treatment plants.
- (k) 40 CFR 60, Subpart XX - Standards for Bulk Gasoline Terminals
- (x) The requirements of the New Source Performance Standards for Bulk Gasoline Terminals, 40 CFR 60, Subpart XX (2X) (326 IAC 12), are not included in the permit for the liquid commodity transfer facility (Transloading Operation), since the unit does not meet the definition of a bulk gasoline terminal, as defined under 40 CFR 60.501. UTG does not operate a gasoline facility which receives gasoline by pipeline, ship or barge. Instead the transloading operation is used for transferring substances, including but not limited to gasoline and methylene chloride, from one (1) cargo tank (i.e., rail tank car or truck tanker) to another cargo tank (i.e., rail tank car or truck tanker).
  - (x) The requirements of the New Source Performance Standards for Bulk Gasoline Terminals, 40 CFR 60, Subpart XX (2X) (326 IAC 12), are not included in the permit for the four (4) diesel fuel dispensing facilities (DFD1 through DFD4), since the diesel fuel dispensing facilities each do not meet the definition of a bulk gasoline terminal, as defined under 40 CFR 60.501. The diesel fuel dispensing facilities are each only capable of handling less than or equal to 1,300 gallons of diesel fuel per day.
- (l) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP)**

(m) The following National Emission Standards for Hazardous Air Pollutants are not included in the permit for the liquid commodity transfer facility (Transloading Operation) or diesel fuel dispensing facilities (DFD1 through DFD4), since this source is not subject to another subpart of 40 CFR, Parts 60, 61, or 63 that references the use of the below listed subparts for air emission control:

- (1) 40 CFR 63, Subpart H - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories: Equipment Leaks (326 IAC 20-12).
- (2) 40 CFR 63, Subpart OO - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories: Tanks--Level 1 (326 IAC 20-35).
- (3) 40 CFR 63, Subpart PP - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories: Containers (326 IAC 20-36).
- (4) 40 CFR 63, Subpart RR - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories: Individual Drain Systems (326 IAC 20-38); and
- (5) 40 CFR 63, Subpart VV - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories: Oil-Water Separators and Organic-Water Separators (326 IAC 20-42).

(n) 40 CFR 63, Subpart EEE - NESHAPs for Hazardous Waste Combustors

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from Hazardous Waste Combustors, 40 CFR 63, Subpart EEE (326 IAC 20-28), are not included in the permit for the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation flare, and each of the non-pressurized rail tank car & truck tanker liquid and dry heel removal stations, as follows:

- (1) each of the pressurized gases combusted in the pressurized rail tank car purging/degassing operation flare is not considered a "hazardous waste" as defined in 40 CFR 63.1201 and 40 CFR 261.3. The pressurized gases combusted by the flare will be unused commercial chemical products, such as:

Butane	Isobutane	Polypropylene
Butylene Mix	Isobutylene	Propane
1-Butene	Isopentane	Propylene
2-Butene	Methylcyclopropane	Refinery Grade Propane
1,2-Butadiene	NeoPentane	Stenched Propane
Ethane	n-Pentane	

These unused commercial chemical products, as received in the pressurized rail tank cars, will not meet any of the hazardous waste criteria under 261.3(a)(2). Each of these pressurized gases (as received in the pressurized rail tank cars) do not exhibit the characteristic of ignitability as defined by 40 CFR 261.21 and are each not considered "ignitable compressed gas" as defined by 40 CFR 261.21(a)(3), because the rail tank cars (as received) will not contain these pressurized gases at an absolute pressure exceeding 40 psia at 70°F and these pressurized gases (as received in the rail tank cars) would not have an absolute pressure exceeding 104 psia at 130°F.

- (2) Each of the residual liquid chemicals processed in the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, and each of the non-pressurized rail tank car & truck tanker liquid and dry heel removal stations will not be combusted, but will be drained/removed and collected in drums that will be sent off-site for re-use or disposal. The pressurized rail tank car purging/degassing operation flare will only be used as a pollution control device to combust residual vapors in the empty pressurized rail tank cars. The residual liquid chemicals (as received in the pressurized rail tank cars) and any

residual vapors combusted in the pressurized rail tank car purging/degassing operation flare are each not considered a "hazardous waste" as defined in 40 CFR 63.1201 and 40 CFR 261.3, because of one or more of the following reasons:

- (A) The residual liquid chemical is considered an unused commercial chemical product that will not meet any of the hazardous waste criteria under 261.3(a)(2). Since these residual liquid chemicals are not a "hazardous waste", the residual vapors combusted in the pressurized rail tank car purging/degassing operation flare are not considered "hazardous waste".
  - (B) The residual liquid chemical will be drained/removed, collected in drums, and sent off-site for re-use, and would not be considered a "solid waste" as defined by 40 CFR 261.2, and therefore not a "hazardous waste" as defined by 40 CFR 261.3, because it would be recycled pursuant to 40 CFR 261.2(e)(1).
  - (C) Each of the rail tank cars and truck tankers processed in the non-pressurized rail tank car and truck tanker cleaning operations that contain residual liquid chemicals will meet the definition of an empty container under 40 CFR 261.7(b)(1) and will not be subject to regulation under 40 CFR Parts 261 through 268, 270, or 124 or to the notification requirements of section 3010 of RCRA. Pursuant to 40 CFR 261.7(b)(1), each of the rail tank cars and truck tankers (approximately 25,000 gallons in size and weighing approximately 65,000 pounds empty) will contain a maximum of 20 gallons (167 pounds, assuming density of 8.34 pounds/gallon) of residual liquid chemicals and will meet the definition of empty, since all wastes will have been previously removed from the rail tank cars that can be removed using the practices commonly employed to remove materials from rail tank cars (e.g., draining, pumping, and/or top unloading using tank pressurization and removal by a dip leg, dip tube, or siphon tube) and each rail tank car will contain no more than 0.3 percent by weight of the total capacity of the container (i.e., approximately 0.25 percent). However, if any of the residual liquid chemicals that are drained/removed and collected in drums for off-site disposal meet any of the hazardous waste criteria under 261.3(a)(2), then those chemicals are considered "hazardous waste" once they are collected in drums for off-site disposal (i.e., the intent to discard the collected chemicals is demonstrated and a "hazardous waste" is thereby generated).
- (3) Each of the residual inorganic chemical solutions/slurries processed in the non-pressurized rail tank car and truck tanker cleaning operations will not be combusted, but will be drained/removed and collected in drums that will be sent off-site for re-use or disposal.
  - (4) Each of the liquid or semi-solid food grade products processed in the non-pressurized rail tank car and truck tanker liquid and dry heel removal stations are not considered "hazardous wastes" as defined in 40 CFR 63.1201 and 40 CFR 261.3 and they are not combusted in the pressurized rail tank car purging/degassing operation flare (i.e., they will be drained/removed and collected in drums that will be sent off-site for re-use or disposal);
  - (5) Each of the residual solid materials processed in the non-pressurized rail tank car and truck tanker cleaning operations will not be combusted, but will be drained/removed and collected in drums that will be sent off-site for re-use or disposal.

The Permitted has agreed to include the following condition in the permit:

- The Permittee shall not combust hazardous waste, as defined under 40 CFR 261.3, in the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized

rail tank car purging/degassing operation flare, and each of the non-pressurized rail tank car & truck tanker liquid and dry heel removal stations.

Note: Compliance with this condition ensures that the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation flare, and each of the non-pressurized rail tank car & truck tanker liquid and dry heel removal stations each do not meet the definition of a hazardous waste combustor under 40 CFR 63, Subpart EEE.

Compliance with this requirement shall render the requirements of 326 IAC 20-28 (40 CFR 63, Subpart EEE, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Waste Combustors) not applicable.

- (o) 40 CFR 63, Subpart VVV - NESHAPs for Source Categories: Publicly Owned Treatment Works  
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories: Publicly Owned Treatment Works, 40 CFR 63, Subpart VVV (326 IAC 20-33), are not included in the permit, since UTG operates a small, source specific, wastewater [pre] treatment facility, and not a publicly owned treatment works (POTW), as defined in 40 CFR 63.1595. UTG is not owned by a municipality (as defined by section 502(4) of the Clean Water Act), a State, an intermunicipal or interstate agency, or any department, agency, or instrumentality of the Federal Government.
- (p) 40 CFR 63, Subpart EEEE - NESHAPs for Source Categories: Organic Liquids Distribution (Non-Gasoline)  
(1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories: Organic Liquids Distribution (Non-Gasoline), 40 CFR 63, Subpart EEEE (4E) (326 IAC 20-83), are not included in the permit for the liquid commodity transfer facility (Transloading Operation), since although the liquid commodity transfer facility (Transloading Operation) meets the definition of an organic liquids distribution (OLD) operation, as defined under 40 CFR 63.2406, this source is not a major source of HAPs, as defined under 40 CFR 63.2.  
(2) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories: Organic Liquids Distribution (Non-Gasoline), 40 CFR 63, Subpart EEEE (4E) (326 IAC 20-83), are not included in the permit for the four (4) diesel fuel storage tanks, associated with diesel fuel dispensing facilities DFD1 through DFD4, since this source is not a major source of HAPs, as defined under 40 CFR 63.2, and does not meet the definition of an organic liquids distribution operation, as defined under 63.2406. Organic liquids, for purposes of this subpart, do not include diesel (No. 2 distillate oil).
- (q) 40 CFR 63, Subpart DDDDD - NESHAPs for Industrial, Commercial, and Institutional Boilers, and Process Heaters  
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (5D) (326 IAC 20), are not included in the permit for the 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), since this source is not a major source of HAPs, and is not located at, nor is a part of, a major source of HAP emissions, as defined under 40 CFR 63.2.
- (r) 40 CFR 63, Subpart CCCCC - NESHAP for the Source Category Identified as Gasoline Dispensing Facilities (GDF)  
(1) The requirements of the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCC (6C) (326 IAC 20), are not included in the renewal for the liquid commodity transfer facility (Transloading Operation), since although this existing source meets the definition of an area source, as defined in 40 CFR § 63.2, the liquid commodity transfer facility

(Transloading Operation) does not meet the definition of a gasoline dispensing facility (GDF), as defined in §63.11132. The liquid commodity transfer facility (Transloading Operation) is used to transfer liquid substances, including but not limited to gasoline, from rail tank car or truck tanker to rail tank car or truck tanker, and not to dispense gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine.

- (2) The requirements of the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCC (6C) (326 IAC 20), are not included in the renewal for the diesel fuel dispensing facilities (DFD1 through DFD4), since although this existing source meets the definition of an area source, as defined in 40 CFR § 63.2, the material being dispensed in the diesel fuel dispensing facilities (DFD1 through DFD4) does not meet the definition of gasoline, as defined in §63.11132. This source is dispensing diesel fuel, which has a Reid vapor pressure of 1.38 kilopascals, and not gasoline, which has a Reid vapor pressure of 27.6 kilopascals.
- (s) 40 CFR 63, Subpart JJJJJJ - NESHAPs for Industrial, Commercial, and Institutional Boilers Area Sources  
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), are not included in the permit for the 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), because gas-fired boilers, as defined under 40 CFR 63.11237, are specifically exempted from this rule as indicated under 40 CFR 63.11195(e).
- (t) 40 CFR 63, Subpart XXXXXX - NESHAPs for Nine Metal Fabrication and Finishing Source Categories  
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (6X) (326 IAC 20), are not included in the permit, because this source is not primarily engaged in any of the operations listed under the nine metal fabrication and finishing source categories, defined under 40 CFR 63.11514 and 63.11522.
- (u) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included in the permit.

<b>State Rule Applicability Determination</b>
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The source-wide state rule applicability is as follows:

- (a) 326 IAC 1-5-2 (Emergency Reduction Plans (ERP))  
Pursuant to 326 IAC 1-5-2, a source that has the potential to emit one hundred (100) tons per year, or more, of any pollutant shall prepare, and submit to the commissioner, for approval, written emergency reduction plans consistent with safe operating procedures. This source has the potential to emit greater than one hundred (100) tons per year of VOCs. Therefore, this source continues to be subject to 326 IAC 1-5-2, and the requirement to maintain an ERP is still included in Section C, of the permit.

*This is an existing requirement for this source.*

- (b) 326 IAC 1-6-3 (Preventive Maintenance Plan (PMP))  
Any person responsible for operating any facility required to obtain a permit under the Federally Enforceable State Operating Permit Program, 326 IAC 2-8, shall prepare and maintain a preventive maintenance plan, in accordance with 326 IAC 1-6-3, including the following information:

- (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.
- (3) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

Preventive maintenance plans shall be submitted to the commissioner upon request and shall be subject to review and approval by the commissioner.

*This is an existing requirement for this source.*

- (c) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))  
PSD applicability is discussed under the "Potential to Emit After Issuance of the Renewal" section above.
- (d) 326 IAC 2-3 (Emission Offset)  
Emission Offset applicability is discussed under the "PTE of the Entire Source After Issuance of the Renewal" Section above.
- (e) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
This existing source has the potential to emit any combination of HAPs of greater than 25 tons per year. However, the entire source was constructed in 1989 and modified in 1990, which was before the rule specified applicability date of July 27, 1997. Therefore, pursuant to 326 IAC 2-4.1(a), the requirements of 326 IAC 2-4.1 do not apply and are not included in the permit.
- (f) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to the requirements of this rule, since although it is located in Lake County, it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it has actual emissions of NOx 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, pursuant to 326 IAC 2-6-1(b), the source is still only subject to additional information requests as provided for in 326 IAC 2-6-5.

*This is an existing requirement for this source.*

- (g) 326 IAC 2-8 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the Renewal" section above.
- (h) 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.

*This is an existing requirement for this source.*

- (i) 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.

*This is an existing requirement for this source.*

- (j) 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County)  
This existing stationary source, located in Lake County, is not specifically listed under 326 IAC 6.8-4, 326 IAC 6.8-5, or 326 IAC 6.8-8 through 326 IAC 6.8-11, or regulated by a more stringent limitation established in 326 IAC 12, has a potential to emit one hundred (100) tons or more, or actual emissions of ten (10) tons or more, of particulate matter per year. Therefore, this source shall continue to comply with the limitations and requirements listed in 326 IAC 6.8-1-2. See the "State Rule Applicability - Individual Facilities" section below for more detail.

*This is an existing requirement for this source.*

- (k) 326 IAC 6.8-8 (Lake County: Continuous Compliance Plan)  
This existing stationary source, located in Lake County, is not specifically listed under 326 IAC 6.8-8(1) through (17), does not have any boilers with a heat input capacity greater than 25 MMBtu/hr., does not perform any manufacturing operations, in that UTG does not produce a product but instead provides a service, and has uncontrolled PM10 emissions that could potentially escape into the atmosphere through roof vents and other openings of less than ten (10) tons per year based on eight thousand seven hundred sixty (8,760) hours of operation and AP-42 emission factors or other documentable emission factors acceptable to the commissioner. Therefore, the requirements of 326 IAC 6.8-8 do not apply and are not included in the permit.

- (l) 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)  
This existing source has potential fugitive particulate emissions (*paved roads*) of less than five (5) tons per year. Therefore, the requirements of 326 IAC 6.8-10-3 do not apply and are not included in the permit.

*This is a revised requirement for this source.*

- (m) 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures)  
This existing stationary source, located in Lake County, is not specifically listed under 326 IAC 6.8-2, has potential PM10 emissions equal to or greater than 10 tons per year. However, this source has opted to limit PM10 emissions from the portable shotblasting unit (PSB1). Therefore, the requirements of 326 IAC 6.8-11 do not apply, and are not included in the permit.

In order to render the requirements of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures) not applicable, the Permittee shall comply with the following:

- (a) Operation of the portable shotblasting unit (PSB1) shall not exceed 2,675 hours per twelve (12) consecutive month period, with compliance determined at the end of each month; and
- (b) PM10 emissions from the portable shotblasting unit (PSB1) shall not exceed 7.00 pounds per hour (lbs/hr).

Compliance with these limits, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than ten (10) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures) not applicable.

*This is a new requirement for this source.*

- (n) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)  
This existing stationary source, located in Lake County, was constructed in 1989 and modified in 1990, and has the potential to emit volatile organic compounds (VOCs) at levels equal to or greater than twenty-five (25) tons per year (tpy). However, the operations at this source were constructed on or before December 31, 1994, are otherwise regulated by the provisions of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties). Therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.
- (o) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)  
The requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) applies to stationary sources located in Lake County that were constructed on or before December 31, 1994, that emit or have the potential to emit volatile organic compounds (VOCs) at levels equal to or greater than twenty-five (25) tons per year (tpy), unless the source's actual emissions were limited on or before May 31, 1995. This existing source was constructed in 1989 and modified in 1990. UTG was issued installation permits by the City of East Chicago in 1992 (VFC Doc# 34603161). In 2001, UTG submitted a permit application to IDEM. At that time, Lake County was designated severe non-attainment for the one-hour ozone standard, and the Emission Offset and Part 70 major source thresholds for NOx and VOC were twenty-five (25) tons per year, each. Since actual emissions were well below these thresholds, UTG opted to limit their source-wide VOC potential emissions to less than the major source levels (25 tons per year) under 326 IAC 2-3 Emission Offset and 326 IAC 2-7 (Part 70 Permits) (*See the "County Attainment Status" section above for more detail*). Consequently, although this source was constructed and operating prior to December 31, 1994, actual VOC emissions have always been less than 25 tons per year and this source has never been subject to the requirements of 326 IAC 8-7.
- See the "State Rule Applicability - Individual Facilities" Non-pressurized Rail Tank Car Cleaning Operation, Truck Tanker Cleaning Operation, Pressurized Rail Tank Car Purging/Degassing Operation, and Transloading Operation, section below for more detail.
- (p) 326 IAC 12 (New Source Performance Standards)  
See the "Federal Rule Applicability" Section of this TSD, above.
- (q) 326 IAC 20 (Hazardous Air Pollutants)  
See the "Federal Rule Applicability" Section of this TSD, above.

<b>State Rule Applicability - Individual Facilities</b>
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***Non-pressurized Rail Tank Car Cleaning Operation, Truck Tanker Cleaning Operation, Pressurized Rail Tank Car Purging/Degassing Operation, and Transloading Operation***

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan (PMP))  
A PMP is required for the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/de-gassing operation, and transloading operation, each.
- (b) 326 IAC 1-7 (Stack Height)
- (1) The requirements of 326 IAC 1-7 do not apply to the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, and transloading operation, since the potential to emit particulate matter (PM), and sulfur dioxide (SO<sub>2</sub>), is less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 are not included in the permit.
- (2) The requirements of 326 IAC 1-7 do not apply to the pressurized rail tank car purging/de-gassing operation flare, since the potential to emit particulate matter (PM), and

sulfur dioxide (SO<sub>2</sub>), is less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 are not included in the permit.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
See the "State Rule Applicability Determination - Entire Source" Section above.
- (d) 326 IAC 4-2-2 (Incinerators)  
The requirements of 326 IAC 4-2-2, do not apply to the pressurized rail tank car purging/degassing operation flare, since a flare, as defined by 326 IAC 1-2-29, is not an incinerator, as defined by 326 IAC 1-2-34, because it burns waste gasses and not waste substances (e.g., solid, semi-solid, or semi-volatile substances including, but not limited to, paper, cardboard, wood, plastic, foam rubber, fabric, synthetic fibers, waxes, lubricants, paint residues, adhesive residues, and other semi-volatile residues), and does not have controls on combustion factors including, but not limited to, temperature, retention time, and air. Therefore, the requirements of 326 IAC 4-2-2 are not included in the permit.
- (e) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)  
The requirements of 326 IAC 6-2 do not apply to the pressurized rail tank car purging/degassing operation flare, since the flare is not a source of indirect heating, as defined under 326 IAC 1-2-19 "Combustion for indirect heating". Therefore, the requirements of 326 IAC 6-2 are not included in the permit.
- (f) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c), the non-pressurized rail tank car cleaning operation and truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, are each not subject to the requirements of 326 IAC 6-3, since these operations are subject to the requirements of 326 IAC 6.8, which are considered more stringent than the particulate limitations established under 326 IAC 6-3.
- (g) 326 IAC 6.8 (Particulate Matter Limitations for Lake County)  
Pursuant to 326 IAC 6.8-1-2(a), the particulate matter emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, shall not exceed 0.03 gr/dscf, each.  
  
*This is an existing requirement for this source.*
- (h) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
The requirements of 326 IAC 7-1.1 do not apply to the pressurized rail tank car purging/degassing operation flare, since the unlimited and uncontrolled potential to emit (PTE) SO<sub>2</sub> from the flare is less than twenty-five (25) tons per year, or 10 pounds/hour. Therefore, the requirements of 326 IAC 7-1.1 are not included in the permit.
- (i) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
See the "State Rule Applicability Determination - Entire Source" Section above.
- (j) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)  
The requirements of 326 IAC 8-4-3, do not apply to the transloading operation, since although this existing stationary source is located in Lake County, and was constructed in 1989 and modified in 1990, the transloading operation is not a gasoline dispensing facility, as defined under 40 CFR Part 63 Subpart CCCCCC, or 326 IAC 8-4-6(a)(8), in that fuel, including but not limited to gasoline, and other liquid substances (commodities) are transferred from one (1) cargo tank (i.e., rail tank car or truck tanker) to another cargo tank (i.e., rail tank car or truck tanker) and not dispensed into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, nonroad engine, or portable container. Therefore, the requirements of 326 IAC 8-4-3 are not included in the permit.

- (k) 326 IAC 8-4-4 Bulk gasoline terminals  
The requirements of 326 IAC 8-4-4, do not apply to the transloading operation, since although this existing stationary source is located in Lake County, and was constructed in 1989 and modified in 1990, the transloading operation does not meet the definition of a bulk gasoline plant under 326 IAC 1-2-7, or a bulk gasoline terminal under 326 IAC 1-2-8, in that this existing, stationary, rail tank car and truck tank cleaning facility, is not a gasoline storage and/or distribution facility. Therefore, the requirements of 326 IAC 8-4-4 are not included in the permit.
- (l) 326 IAC 8-4-6 (Gasoline Dispensing Facilities)  
The requirements of 326 IAC 8-4-6, do not apply to the transloading operation, since the transloading operation is not a gasoline dispensing facility, as defined under 326 IAC 8-4-6(a)(8), in that fuel, including but not limited to gasoline, and other liquid substances (commodities) are transferred from one (1) cargo tank (i.e., rail tank car or truck tanker) to another cargo tank (i.e., rail tank car or truck tanker) and not dispensed into motor vehicle fuel tanks or portable containers. Therefore, the requirements of 326 IAC 8-4-6 are not included in the permit.
- (m) 326 IAC 8-4-7 (Petroleum Sources - Gasoline Transports)  
The requirements of 326 IAC 8-4-7 do not apply to the transloading operation, since although this existing stationary source is located in Lake County, and was constructed in 1989 and modified in 1990, the transloading operation is not required by any Article 8 provision to be equipped with a vapor balance system or vapor recovery system. Therefore, the requirements of 326 IAC 8-4-7 are not included in the permit.
- (n) 326 IAC 8-4-9 (Leaks from transports and vapor collection systems, records)  
The requirements of 326 IAC 8-4-9, do not apply to the transloading operation, since although this existing stationary source is located in Lake County, and was constructed in 1989 and modified in 1990, the transloading operation is not subject the requirements of 326 IAC 8-4-4, 326 IAC 8-4-5, 326 IAC 8-4-6, or 326 IAC 8-4-7. Therefore, the requirements of 326 IAC 8-4-9 are not included in the permit.
- (o) 326 IAC 8-6-1 (Organic Solvent Emission Limitations)  
The requirements of 326 IAC 8-6-1, do not apply to the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, or the transloading operation, since although this source is located in Lake County, it was not existing as of January 1, 1980 (this source was constructed in 1989 and modified in 1990). Therefore, the requirements of 326 IAC 8-6-1 are not included in the permit.
- (p) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)  
See the "State Rule Applicability Determination - Entire Source" Section above.

The requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) applies to stationary sources located in Lake County that were constructed on or before December 31, 1994, that emit or have the potential to emit volatile organic compounds (VOCs) at levels equal to or greater than twenty-five (25) tons per year (tpy), unless the source's actual emissions were limited on or before May 31, 1995. This existing source was constructed in 1989 and modified in 1990.

VOC potential emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, each, are greater than twenty-five (25) tons per year. However, UTG has opted to limit their source-wide VOC potential emissions to less than the major source levels (25 tons per year), therefore the requirements of 326 IAC 8-7 do not apply to the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, or the transloading operation, and are not included in the permit.

In order to render the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) not applicable, the source shall comply with the following:

- (1) VOC emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) For the purpose of this permit, the term "Waste Flammable Liquids" means the residue from a rail tank car or truck tanker that last contained a liquid with a flashpoint less than 140 degrees Fahrenheit (°F) and includes but is not limited to fuels blended from various types of liquid wastes, waste solvents, and other waste organic liquids.

Compliance with these limits, combined with the potential to emit VOCs from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) not applicable.

***This is a new requirement for this source.***

*Note: Since actual VOC emissions are dependent on the type and physical properties of the residual organic chemical being removed from the rail tank cars and/or truck tankers, and in order to provide maximum operational flexibility, compliance with the above listed VOC limits will be determined using the equations listed in the "Compliance Determination, Monitoring and Testing Requirements" section, below.*

- (q) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)  
The requirements of 326 IAC 8-9, do not apply to the transloading operation, since although this existing source is located in Lake County, the cargo tanks (i.e., rail tank cars and truck tankers) are not stationary vessels. Therefore, the requirements of 326 IAC 8-9 are not included in the permit for the transloading operation.
- (r) 326 IAC 8-18 (VOC Rules; Synthetic Organic Chemical Manufacturing Industry Air Oxidation, Distillation, and Reactor Processes)  
This source is not subject to the requirements of 326 IAC 8-18, since although it is located in Lake County, this source does not contain any air oxidation unit processes, distillation operations, and reactor processes as defined by 326 IAC 8-18-1(b). Therefore, the requirements of 326 IAC 8-18 are not included in the permit.
- (s) 326 IAC 8-19 (VOC Rules; Control of Volatile Organic Compound Emissions from Process Vents in Batch Operations)  
This source is not subject to the requirements of 326 IAC 8-19, since although it is located in Lake County, this source does not have a batch process train associated with any of the SIC code listed in 326 IAC 8-19(a), and the potential to emit VOC is limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 8-19 are not included in the permit.
- (t) 326 IAC 8-20 (Industrial Wastewater)  
The requirements of 326 IAC 8-20, do not apply to the non-pressurized rail tank car cleaning operation or the truck tanker cleaning operation, since although this existing stationary source is located in Lake County, and has combined total potential to emit VOC emissions equal to or greater than one hundred (100) tons per year from industrial wastewater sources, non-control technique guideline (non-CTG) sources, and unregulated emissions from CTG emission units, this source operates under Standard Industrial Classification (SIC) codes 4789 (Transportation Services, Not Elsewhere Classified) and 4785 (Fixed Facilities and Inspection and Weighing

Services for Motor Vehicle Transportation), and not 2821, 2823, 2824, 2865, or 2869 for the Organic chemicals, plastics, and synthetic fibers manufacturing industry, or 2833, 2834, or 2836 for the Pharmaceutical industry, or 2879 for the Pesticide manufacturing industry, or 4952, 4953, or 4959 Hazardous waste treatment, storage, and disposal facilities. Therefore, the requirements of 326 IAC 8-20 are not included in the permit.

- (u) There are no other 326 IAC 8 Rules that are applicable to the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, or the transloading operation.

### ***Portable Shotblasting Unit (SB1)***

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan (PMP))  
A PMP is required for this unit and any associated control devices.
- (b) 326 IAC 1-7 (Stack Height)  
The unlimited and uncontrolled potential to emit (PTE) PM and SO<sub>2</sub> from the portable shotblasting unit (SB1) are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply to SB1, and are not included in the permit.
- (c) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c), the portable shotblasting unit (SB1) is not subject to the requirements of 326 IAC 6-3, since it is subject to the requirements of 326 IAC 6.8, which are considered more stringent than the particulate limitations established under 326 IAC 6-3.
- (d) 326 IAC 6.8 (Particulate Matter Limitations for Lake County)  
Pursuant to 326 IAC 6.8-1-2(a), the particulate matter emissions from the portable shotblasting unit (SB1) and associated spent media cleanout shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).  
  
*This is an existing requirement for this source.*
- (e) 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures)  
See the "State Rule Applicability Determination - Entire Source" Section above.

### ***Insignificant Natural Gas Combustion Units***

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan (PMP))  
A PMP is required for the 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1).
- (b) 326 IAC 1-7 (Stack Height)
  - (1) The unlimited and uncontrolled potential to emit (PTE) PM and SO<sub>2</sub> from the one (1) 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply to Boiler B1, and are not included in the permit.
  - (2) The unlimited and uncontrolled potential to emit (PTE) PM and SO<sub>2</sub> from the five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply to any of these direct-fired units, and are not included in the permit.  
*See TSD Appendix A for the detailed calculations.*
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
See the "State Rule Applicability Determination - Entire Source" Section above.

(d) 326 IAC 4-2-2 (Incinerators)

- (1) The one (1) 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), is not an incinerator, as defined by 326 IAC 1-2-34, since the unit does not burn waste substances. Therefore, the requirements of 326 IAC 4-2-2 do not apply to Boiler B1, and are not included in the permit.
- (2) The five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, are each not incinerators, as defined by 326 IAC 1-2-34, since the units do not burn waste substances. Therefore, the requirements of 326 IAC 4-2-2 do not apply to any of the direct-fired HVAC units or heaters, and are not included in the permit.

(e) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

- (1) The one (1) 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), is not subject to the requirements of 326 IAC 6-2, since it is subject to the requirements 326 IAC 6.8.
- (2) The five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, are each not subject to the requirements of 326 IAC 6-2, since they are each not sources of indirect heating, as defined under 326 IAC 1-2-19 "Combustion for indirect heating".

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

- (1) The one (1) 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), is not subject to the requirements of 326 IAC 6-3, since it is subject to the requirements 326 IAC 6.8, which are considered more stringent than the particulate limitation established under 326 IAC 6-3.
- (2) The five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, are each not subject to the requirements of 326 IAC 6-3, since they are each subject to the requirements 326 IAC 6.8, which are considered more stringent than the particulate limitation established under 326 IAC 6-3.

(g) 326 IAC 6.8 (Particulate Matter Limitations for Lake County)

- (1) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter emissions from the one (1) 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), shall not exceed 0.01 gr/dscf.

*This is an existing requirement for this source.*

- (2) Pursuant to 326 IAC 6.8-1-2(a), the particulate matter emissions from the five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, shall not exceed 0.03 gr/dscf, each.

*This is an existing requirement for this source.*

(h) 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

- (1) The unlimited and uncontrolled potential to emit (PTE) SO<sub>2</sub> from the one (1) 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), is less than twenty-five (25) tons per year, or 10 pounds/hour. Therefore, the requirements of 326 IAC 7-1.1 do not apply to any of these indirect-fired heating units, and are not included in the permit.
- (2) The unlimited and uncontrolled potential to emit (PTE) SO<sub>2</sub> from the five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, and the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, is less than twenty-five (25) tons per year, or 10 pounds/hour, each. Therefore, the requirements of 326 IAC 7-1.1 do not apply to any of these direct-fired units, and are not included in the permit.

- (i) 326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)  
See the "State Rule Applicability Determination - Entire Source" Section above.
- (j) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)  
See the "State Rule Applicability Determination - Entire Source" Section above.
- (k) There are no 326 IAC 8 Rules applicable to the 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), the five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, or the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters.
- (l) 326 IAC 9-1 (Carbon Monoxide Emission Limits)  
The requirements of 326 IAC 9-1 are not included in the permit for the one (1) 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), the five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, or the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, because this source does not operate any catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.
- (m) 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)  
The one (1) 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1), five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, or the four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, are each not subject to the requirements of 326 IAC 10-3, because neither the boiler, the direct-fired HVAC units, or the direct-fired heaters are a blast furnace gas-fired boiler, a Portland cement kiln, or any facility specifically listed under 326 IAC 10-3-1(a)(2).

#### ***Diesel Fuel Dispensing (DFD) Facilities***

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan (PMP))  
A PMP is required for this unit and any associated control devices.
- (b) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)  
See the "State Rule Applicability Determination - Entire Source" Section above.
- (c) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)  
The requirements of 326 IAC 8-4-3 do not apply to the diesel fuel dispensing facilities (DFD1 through DFD4), since the associated diesel fuel storage tanks each has a maximum storage capacity of less than 39,000 gallons (150,000 liters), and the liquid stored in the tank has a true vapor pressure of less than 10.5 kPa (1.52 psi).
- (d) 326 IAC 8-4-4 Bulk gasoline terminals  
The requirements of 326 IAC 8-4-4 do not apply to the diesel fuel dispensing facilities (DFD1 through DFD4), since the diesel fuel dispensing facilities (DFD1 through DFD4) each do not meet the definition of a Bulk gasoline terminal, under 326 IAC 1-2-8, or a Bulk gasoline plant, under 326 IAC 1-2-7. This source does not dispense gasoline, only diesel fuel oil.
- (e) 326 IAC 8-4-6 (Gasoline Dispensing Facilities)  
The requirements of 326 IAC 8-4-6 do not apply to the diesel fuel dispensing facilities (DFD1 through DFD4), since although this existing stationary source is located in Lake County, the diesel fuel dispensing facilities (DFD1 through DFD4) each do not meet the definition of a gasoline dispensing facility. Diesel fuel is not considered a motor vehicle fuel.
- (f) 326 IAC 8-4-7 (Petroleum Sources - Gasoline Transports)  
The requirements of 326 IAC 8-4-7 do not apply to the diesel fuel dispensing facilities (DFD1 through DFD4), since the source is dispensing diesel fuel into smaller vehicles and not gasoline into a tractor semi-trailer capable of hauling a maximum load permissible by law of liquid petroleum products with various sized compartment and typically a total capacity of approximately eight thousand (8,000) gallons.

- (g) 326 IAC 8-4-9 (Leaks from transports and vapor collection systems, records)  
The requirements of 326 IAC 8-4-9 do not apply to the diesel fuel dispensing facilities (DFD1 through DFD4), since although this existing stationary source is located in Lake County, and was constructed in 1989 and modified in 1990, the diesel fuel dispensing facilities are not subject the requirements of 326 IAC 8-4-4, 326 IAC 8-4-5, 326 IAC 8-4-6, or 326 IAC 8-4-7. Therefore, the requirements of 326 IAC 8-4-9 are not included in the permit.
- (h) 326 IAC 8-6-1 (Organic Solvent Emission Limitations)  
The requirements of 326 IAC 8-6-1 do not apply to the diesel fuel dispensing facilities (DFD1 through DFD4), since although this source is located in Lake County, it was not existing as of January 1, 1980 (this source was constructed in 1989 and modified in 1990). Therefore, the requirements of 326 IAC 8-6-1 are not included in the permit.
- (i) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)  
See the "State Rule Applicability Determination - Entire Source" Section above.
- (j) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)  
Pursuant to 326 IAC 8-9-1, this rule applies to stationary vessels, located in Lake County, that are used to store volatile organic liquid (VOL). Although this existing source is located in Lake County, the diesel fuel dispensing facilities (DFD1 through DFD4), and associated diesel fuel storage tanks have a combined maximum storage capacity of less than 39,000 gallons (150,000 liters), and the liquid stored in the tanks has a maximum true vapor pressure of less than five-tenths (0.5) pound per square inch absolute (psia). Therefore, pursuant to 326 IAC 8-9-1(b), the diesel fuel storage tanks are each subject to reporting and recordkeeping provisions of section 6(a) and 6(b) of this rule and are exempt from all other provisions of this rule.
- (a) Pursuant to 326 IAC 8-9-6(a), the Permittee shall maintain records required by subsection (b) for the life of the vessel.
- (b) Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record and submit to IDEM, OAQ a report, for the diesel fuel storage tanks, containing the following information for each vessel:
- (1) The vessel identification number;
  - (2) The vessel dimensions;
  - (3) The vessel capacity; and
  - (4) A description of the emission control equipment for each vessel described in 326 IAC 8-9-4(a) and 4(b), if applicable, or a schedule for installation of emission control equipment on vessels described in 326 IAC 8-9-4(a) and 4(b), if applicable, with a certification that the emission control equipment meets the applicable standards.
- This is an existing requirement for this source.*
- (k) There are no other 326 IAC 8 Rules that are applicable to the diesel fuel dispensing (DFD) facility.

## Compliance Determination, Monitoring and Testing Requirements

### Compliance Determination Requirements

(a) The non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation has applicable compliance determination conditions, as follows:

(1) Except as otherwise specified in item (6) below, compliance with the VOC and HAP limitations in the permit shall be determined using the following equation:

$$E_{TOT} = \sum_{m=1}^{12} (E_{NPR} + E_{TT} + E_{PR} + E_{TO})_m$$

Note: To simplify compliance determination, recordkeeping, and reporting, UTG has requested that HAP emissions be assumed equal to 100% of VOC emissions. IDEM is satisfied that this is a conservative estimate since not all VOCs are HAPs.

Where:

- $E_{TOT}$  = Total Volatile organic compound (VOC), Total Hazardous Air Pollutants (HAP), or Highest Single Hazardous Air Pollutant (HAP) emissions (tons) from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, for a 12 consecutive month period (tons/12-months).
- $E_{NPR}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation (tons/month), as calculated in subsection (b), below.
- $E_{TT}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the truck tanker cleaning operation (tons/month), as calculated in subsection (c), below.
- $E_{PR}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the pressurized rail tank car purging/degassing operation controlled by the flare (tons/month), as calculated in subsection (d), below.
- $E_{TO}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the transloading operation (tons/month), as calculated in subsection (e), below.
- $m$  = Each month in 12 consecutive month period.

***This is a revised requirement for this source. This is a change from limiting the throughput of tank trucks and rail tank cars, and the vapor pressure of the substances cleaned from each unit.***

(2) Except as otherwise specified in item (6) below, total VOC, Total HAP, and Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation shall be calculated using the following equation:

$$E_{NPR} = \sum_{y=1}^Y \left[ \left( \sum_{l=1}^L \frac{W_l}{2000 \text{ lbs/ton}} \right) + \left( \sum_{s=1}^S \frac{W_s}{2000 \text{ lbs/ton}} \right) \right]$$

Where:

- $E_{NPR}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation (tons/month).

- Y = Total VOC, Total HAP, or Highest Single HAP.  
y = Each Individual VOC or HAP.  
L = Total number of non-pressurized rail tank cars processed in a month that contained a List 1 substance.  
l = Each non-pressurized rail tank car processed in a month that contained a List 1 substance.  
W<sub>l</sub> = List 1 substance specific reporting value (lbs/rail tank car). The reporting values for the List 1 substances are as follows:
- Methanol: 36 pounds per rail tank car.
  - Waste Flammable Liquids: 26.0 pound per rail tank car.
  - Gasoline, gasoline additives, and naphtha: 16 pounds per rail tank car.
  - Methylene chloride: 8.0 pounds per rail tank car.
  - Dichlorobenzene: 3.0 pounds per rail tank car.
  - Butyl acetate, vinyl acetate, glycols, glycol ethers, glycerin, and formaldehyde: 2.0 pounds per rail tank car.
  - Ethyl acetate, ethanol, furfuryl alcohol: 1.5 pound per rail tank car.
  - Toluene, xylene, diesel, mineral spirits, methyl ethyl ketone, heptane, hexane, styrene, isopropyl alcohol: 1.0 pound per rail tank car.
  - Residues of petroleum products (except gasoline), including but not limited to crude oil, asphalt, diesel fuel, kerosene, and motor oil: 1.0 pound per rail tank car.
  - Surfactants, herbicides, pesticides: 0.2 pound per rail tank car.
  - Vegetable oils, waxes, soap, and mineral oil result in no VOC or HAP emissions.
- S = Total non-pressurized rail tank cars processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.  
s = Each non-pressurized rail tank car processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.  
W<sub>s</sub> = A substance specific reporting value for each VOC or HAP containing substances that was not a List 1 substance shall be 1.0 pound per rail tank car, or shall be calculated assuming that substance vapor concentration is 10% of the lower explosive limit (LEL) using the following equation:

$$W_s = \frac{\left(\frac{LEL_s}{1000}\right) * V * 760 * MW_s}{998.9 * 293.15}$$

Where:

- LEL<sub>s</sub> = Lower explosive limit (LEL) of substance (expressed as a percentage).  
1000 = Factor to convert to 10% of the LEL.  
V = Volume of non-pressurized rail tank car (ft<sup>3</sup>).  
760 = Standard pressure (760 mmHg).  
MW<sub>s</sub> = Molecular weight of substance (lb/lbmole).  
998.9 = Ideal Gas Law Constant (998.9 mmHg- ft<sup>3</sup>/lbmole-K).  
293.15 = Standard temperature (293.15 K).

Calculated W<sub>s</sub> values of less than 0.001 shall be reported as 0.001.

***This is a new requirement for this source.***

- (3) Except as otherwise specified in item (6) below, total VOC, Total HAP, and Highest Single HAP emissions from the truck tanker cleaning operation shall be calculated using the following equation:

$$E_{TT} = \sum_{y=1}^Y \left[ \left( \sum_{l=1}^L \frac{W_l}{2000 \text{ lbs/ton}} \right) + \left( \sum_{s=1}^S \frac{W_s}{2000 \text{ lbs/ton}} \right) \right]$$

Where:

- $E_{TT}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the truck tanker cleaning operation (tons/month).
- $Y$  = Total VOC, Total HAP, or Highest Single HAP.
- $y$  = Each Individual VOC or HAP.
- $L$  = Total number of truck tankers processed in a month that contained a List 1 substance.
- $l$  = Each truck tanker processed in a month that contained a List 1 substance.
- $W_l$  = List 1 substance specific reporting value (lbs/truck tanker). The reporting values for the List 1 substances are as follows:
- Methanol: 10.4 pounds per truck tanker.
  - Waste Flammable Liquids: 7.3 pounds per truck tanker.
  - Gasoline, gasoline additives, and naphtha: 4.6 pounds per truck tanker.
  - Methylene chloride: 2.5 pounds per truck tanker.
  - Dichlorobenzene: 1.0 pound per truck tanker.
  - Butyl acetate, vinyl acetate, glycols, glycol ethers, glycerin, and formaldehyde: 0.6 pound per truck tanker.
  - Ethyl acetate, ethanol, furfuryl alcohol: 0.5 pound per truck tanker.
  - Toluene, xylene, diesel, mineral spirits, methyl ethyl ketone, heptane, hexane, styrene, isopropyl alcohol: 0.3 pound per truck tanker.
  - Residues of petroleum products (except gasoline), including but not limited to crude oil, asphalt, diesel fuel, kerosene, and motor oil: 0.25 pound per truck tanker.
  - Surfactants, herbicides, pesticides: 0.05 pound per truck tanker.
  - Vegetable oils, waxes, soap, and mineral oil result in no VOC or HAP emissions.
- $S$  = Total truck tankers processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.
- $s$  = Each truck tanker processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.
- $W_s$  = A substance specific reporting value for each VOC or HAP containing substances that was not a List 1 substance shall be 0.3 pounds per truck tanker, or shall be calculated assuming that substance vapor concentration is 10% of the lower explosive limit (LEL) using the following equation:

$$W_s = \frac{\left( \frac{LEL_s}{1000} \right) * V * 760 * MW_s}{998.9 * 293.15}$$

Where:

- LEL<sub>s</sub> = Lower explosive limit (LEL) of substance (expressed as a percentage).
- 1000 = Factor to convert to 10% of the LEL.
- V = Volume of truck tanker (ft<sup>3</sup>).
- 760 = Standard pressure (760 mmHg).
- MW<sub>s</sub> = Molecular weight of substance (lb/lbmole).
- 998.9 = Ideal Gas Law Constant (998.9 mmHg- ft<sup>3</sup>/lbmole-K).
- 293.15 = Standard temperature (293.15 K).

Calculated W<sub>s</sub> values of less than 0.001 shall be reported as 0.001.

***This is a new requirement for this source.***

- (4) Except as otherwise specified in item (6) below, total VOC, Total HAP, and Highest Single HAP emissions from the pressurized rail tank car purging/degassing operation controlled by the flare shall be calculated using the following equation:

$$E_{PR} = \sum_{r=1}^R \frac{F * H_r}{2000 \text{ lbs/ton}}$$

Where:

- E<sub>PR</sub> = Total VOC, Total HAP, or Highest Single HAP emissions from the pressurized rail tank car purging/degassing operation controlled by the flare (tons/month).
- R = Total number of pressurized rail tank cars processed in a month.
- r = Each pressurized rail tank car processed in a month.
- F = Source specific emission rate for the pressurized rail tank car purging/degassing operation controlled by the flare at the flare outlet exhaust established during most recent valid stack test.  
 Until superseded by the most recent valid stack test, the emission rate of 0.51 pounds VOC or HAP per hour for the pressurized rail tank car purging/degassing operation controlled by the flare at the flare outlet exhaust that was established in the 2012 stack test shall be used.
- H<sub>r</sub> = Total time spent purging/degassing each pressurized rail tank cars to the flare (hours).

***This is a revised requirement for this source. This is a change from measuring the gas flow rate in cubic feet per hour.***

- (5) Except as otherwise specified in item (6) below, total VOC, Total HAP, and Highest Single HAP emissions from the transloading operation shall be calculated using the following equation:

$$E_{TO} = \sum_{x=1}^X \left( \frac{12.46 * S_i * P_i * M_i * G_i}{T_i * \left(1000 \frac{\text{gallons}}{\text{kgal}}\right) * (2000 \text{ lbs/ton})} \right)_x$$

Where:

- E<sub>TO</sub> = Total VOC, Total HAP, or Highest Single HAP emissions from the transloading operation (tons/month).

- X = Total number of rail tank cars or tanker trailers transloaded in a month.
- x = Each rail tank car or tanker trailer transloaded in a month.
- 12.46 = Factor to convert to units of lb/kgal of liquid loaded.
- i = Each specific liquid transloaded in a month.
- S<sub>i</sub> = Saturation factor for type of liquid loading (AP 42, Table 5.2-1)
- P<sub>i</sub> = True vapor pressure of liquid loaded (psia) from AP 42, Table 7.1-2 (or other valid source of chemical data)
- M<sub>i</sub> = Average molecular weight of Total VOC, Total HAP, or Highest Single HAP vapors (lb/lb-mole) emitted from specific liquid loaded (AP 42, Table 7.1-2 or other source of chemical data)
- T<sub>i</sub> = Temperature of liquid loaded °R (°F+460)
- G<sub>i</sub> = Total volume of liquid loaded into each rail tank car or tanker trailer (gallons).

***This is a new requirement for this source.***

- (6) As an alternative to calculating Highest Single HAP emissions using the equations in items (1) through (5) above, the Permittee may determine compliance with the Single HAP emission limitation using the Total HAP emissions for any month that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period.
- (b) The pressurized rail tank car purging/degassing operation has applicable compliance determination conditions, as follows:

- (1) In order to assure compliance with the VOC and HAP limits in the permit, the flare shall be in operation and control VOC and HAP emissions from the pressurized rail tank car purging/degassing operation at all times that the pressurized rail tank car purging/degassing operation is in operation; and

*This is an existing requirement for this source.*

- (2) Testing requirements, as follows:

Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Flare	VOCs & HAPs	Within 5 yrs of last valid test <sup>(1)</sup>	Once every five (5) years

These testing requirements are required to confirm compliance with 326 IAC 2-8-4 (FESOP), and the limits that render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) not applicable. The last valid test occurred on October 26, 2012.

*This is an existing requirement for this source.*

- (c) There are no compliance determination requirements applicable to any of the other emission units at this existing source.

*Compliance Monitoring Requirements*

- (d) The pressurized rail tank car purging/degassing operation flare has applicable compliance monitoring conditions, as follows:

Control Device	Operating Parameters	Frequency	Excursions and Exceedances
Flare	presence of flame	continuously while in operation	Response Steps
	elapsed time that gas is vented to the flare	continuously while in operation	Response Steps

These monitoring conditions are necessary because the flare for the pressurized rail tank car purging/degassing operation must operate properly to assure compliance with 326 IAC 2-8-4 (FESOP), and the limits that render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) not applicable.

- (e) There are no compliance monitoring requirements applicable to any of the other emission units at this existing source.

<b>Proposed Changes</b>
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The following changes listed below were made as part of the renewal.

1. Existing Sections D.1 - Emissions Unit Operation Conditions for the Railcar and Tank truck Cleaning Operations and D.2 - Emissions Unit Operation Conditions for the Pressurized Railcar Purging/Degassing operation, have been merged to allow for combined VOC and HAPs limits for all the cleaning operations. Compliance determination, record keeping, and reporting requirements have been revised to ensure the FESOP status of the source is maintained. The compliance monitoring requirements for the flare have been revised for clarity; and
2. The existing FESOP Quarterly Report Forms for VOC and HAPs have been revised to reflect the changes made to the emission limitations contained in Section D.1 of the permit.

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. **Throughout the permit**
  - A. IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.  
  
 Mailing Address: ~~1150 E. 145th Street, East Chicago, IN 46312~~
  - B. Throughout the permit, the emission unit descriptions have been revised to more closely reflect the actual operating conditions at the source, and for clarity.
  - C. **Multiple Conditions - Timeframe References**  
 IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all references to timelines have been revised to "no later than" or "not later than" except for the timelines in subparagraphs (b)(4) and (b)(5) of Section B - Emergency Provisions and Section B - Annual Fee Payment, in which the underlying rules state "within".
  - D. **Multiple Conditions - Certification Requirement References**  
 IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet.

2. Existing Section A.1 - General Information, has been revised for clarity. Additionally, the SIC Code has been updated to include the SIC for Rail Tank Car Cleaning, SIC descriptions have been added for clarity, and the Source Location Status has been revised to reflect the change in PM2.5 attainment status, as follows:
3. A new Section A - Specifically Regulated Insignificant Activities has been added to clarify which Insignificant Activities have requirements that must be met.
4. IDEM, OAQ has made changes to some of the standard language in the B and C conditions of the permit to help clarify the intent of these conditions. The following revisions have been made to the B and C Sections of the permit:
  - A. **Section B - Duty to Provide Information**  
IDEM, OAQ has revised Section B - Duty to Provide Information by removing the statement that the submittal by the Permittee requires the certification by the "authorized individual".
  - B. **Section B - Certification**  
IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule and to clarify that Section B - Certification only states what a certification must be.
  - C. **Section B - Preventive Maintenance Plan**  
IDEM, OAQ has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM, OAQ has also decided to clarify other aspects of Section B - Preventive Maintenance Plan.
  - D. **Section B - Deviation from Permit Requirements and Section C - General Reporting Requirements**  
IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, Section B - Deviation from Permit Requirements and Conditions has been removed and the requirements of that condition have been added to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM, OAQ already states the timeline and certification needs of each report in the condition requiring the report.
  - E. **Section B - Permit Renewal**  
IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
  - F. **Section B - Operational Flexibility**  
On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The change is only to site of these rules in Section B - Operational Flexibility. IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.
  - G. **Section B - Advanced Source Modification Approval**  
The Permittee does not have any equipment that was previously approved for construction but has not yet been incorporated into the operating permit. Therefore, Section B - Advanced Source Modification Approval has been removed from the permit.
  - H. **Section C - Overall Source Limit**  
Lake County is no longer designated as a severe non-attainment for the one-hour ozone standard. The one-hour ozone standard has been revoked, and Lake County is currently

designated as moderate nonattainment for the 8-hour ozone standard. Therefore, Section C - Overall Source Limit has been revised.

- I. **Section C - Opacity**  
IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- J. **Section C - Incineration**  
IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.
- K. **Section C - Fugitive Particulate Matter Emissions**  
Fugitive particulate emissions (paved roads) of less than five (5) tons per year. Therefore, IDEM, OAQ has deleted Section C - Fugitive Dust Emissions.
- L. **Section C - Performance Testing**  
IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- M. **Section C - Compliance Monitoring**  
IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin. Additionally, the reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.
- N. **Section C - Monitoring Methods**  
IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- O. **Section C - Instrument Specifications**  
IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- P. **Section C - Response to Excursions or Exceedances**  
IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
- Q. **Section C - Actions Related to Noncompliance Demonstrated by a Stack Test**  
IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was revised from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, the Permittee

or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

- R. **Section C - Emission Statement**  
IDEM, OAQ has removed Section C - Emission Statement, since the source has a limited potential to emit VOC of less than the threshold of 25 tons per year, and the requirements do not apply.
  - S. **Section C - General Record Keeping Requirements**  
The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph. Additionally, IDEM has added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlining rule. Also, IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping; and
  - T. **Section C - General Reporting Requirements**  
IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.
5. Existing Section D.3 - Emissions Unit Operation Conditions for the Specifically Regulated Insignificant activities has been renumbered as D.2. The following revisions have been made to Sections D.2 of the permit:
- A. Existing condition D.3.1 - Particulate Matter, has been deleted, with the requirements moved to Condition D.2.2.
  - B. Existing condition D.3.2 - Fugitive Particulate Matter Emission Limitations [326 IAC 6.8-10] has been deleted.
  - C. Existing condition D.3.3 has been deleted, with the requirements moved to Condition D.2.2.
  - D. New conditions D.2.3(b) and D.2.3(c)- have been added to incorporate the record keeping requirements as required by 326 IAC 8-9 for the diesel fuel storage tank.
  - E. New conditions D.2.1, D.2.3(a), and D.2.4 and an associated reporting form, have been added to incorporate an hours of operation limit for the portable shotblasting unit (PSB1) in order to render the requirements of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures) not applicable, with associated recordkeeping and reporting.
6. IDEM, OAQ has made changes to some of the standard language in conditions in the D Sections of the permit to help clarify the intent of these conditions. The following revisions have been made to the D Sections of the permit:
- A. For clarity, IDEM, OAQ has changed references to the general conditions such as "in accordance with Section B", "in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligation with regard to the records required by this condition.
  - B. IDEM, OAQ has decided to clarify Section D - Testing Requirements to state that testing shall be done in accordance with 326 IAC 3-6 instead of in accordance with another permit condition that refers to 326 IAC 3-6.

- C. The word "status" has been added to the Record Keeping Requirements and Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
- D. IDEM, OAQ has included the replacement of an instrument as an acceptable action in the Parametric Monitoring Condition. Additionally, IDEM, OAQ has decided to allow the Permittee the option of using manufacturer's recommendations for the calibration frequency.
- E. IDEM, OAQ has revised the language to clarify that a reasonable response may contain one or more steps; and
- F. After discussions with EPA, OAQ decided to add a rule cite for the Compliance Determination Requirements subsection title in the D Sections. The addition of this rule cite, is to satisfy EPA's concerns. IDEM has added a citation to 326 IAC 2-8-4(1) to the Compliance Determination subheading in D Sections. The FESOP Compliance Monitoring Requirements cite have been changed from 326 IAC 2-8-4 and 326 IAC 2-8-5(a)(1) to 326 IAC 2-8-4(1) and 326 IAC 2-8-5(a)(1) to match the other rule cites.

7. **Reporting Forms**

The following changes have been made to the forms at the end of the permit:

- A. IDEM, OAQ has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.  
  
~~Attach a signed certification to complete this report.~~
- B. The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.
- C. IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.
- D. The Quarterly Report form has been modified to include a line for the quarter of the year and to remove the numbered months. The Permittee should state which quarter and months are being reported; and
- E. The FESOP Emergency Occurrence Report failed to include the word 'daytime'. 'Daytime' is in the rule and the condition. We are updating the reporting form to be consistent with the rule. The model also referenced the Title V rule. Some consultants have noticed this before. FYI, the reference to 326 IAC 2-7-1(12) for the definition of 'emergency' is correct. Check your permit to see if this has been corrected already based on comment made by the source or consultant.

Unaffected permit conditions have been re-numbered and the Table of Contents updated, as applicable. The Permit has been revised as follows, with deleted language shown as ~~strikeouts~~ and new language **bolded**.

A.1 **General Information [326 IAC 2-8-3(b)]**

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The Permittee owns and operates a stationary **rail tank car**, railcar, and truck tanker cleaning facility.

\* \* \* \* \*

SIC Code: **4789 (Transportation Services, Not Elsewhere Classified)**  
**4785 (Fixed Facilities and Inspection and Weighing Services for Motor Vehicle Transportation);**

\* \* \* \* \*

Source Location Status: Nonattainment for 8-hour ozone standard  
Nonattainment for PM<sub>2.5</sub> standard  
Attainment for all other criteria pollutants

\* \* \* \* \*

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

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

- (a) One (1) **non-pressurized rail tank car cleaning operation, including one (1) cleaning bay**, constructed in 1989, **with a maximum throughput capacity of one (1) rail tank car per three (3) hours (equivalent to 0.33 rail tank cars per hour)**, uncontrolled and venting **inside** to building B, ~~without controls~~, which exhausts to vent B.
- (b) One (1) **truck tanker truck-cleaning operation, including two (2) cleaning bays**, constructed in 1990, **with a maximum throughput capacity of two (2) truck tankers per one (1) hour, each (equivalent to 2.0 truck tankers per hour, total)**, uncontrolled and venting ~~to inside~~ building A, ~~without controls~~, which exhausts to vent A.
- (c) One (1) **pressurized rail tank car purging/degassing operation, including a manifold that allows up to three (3) pressurized rail tank cars to exhaust to the flare at any one time**, constructed in 1990, with a maximum throughput capacity of ~~one (1)~~ **four (4) rail tank car per two (2) hours (equivalent to 1.5 pressurized rail tank cars per hour)**, with VOC emissions controlled by a flare with **one (1) 0.102 MMBtu/hr** natural gas-fired pilot, and exhausting **outside the building** to stack S-1.
- (d) **One (1) liquid commodity transfer facility, identified as the Transloading Operation, constructed in 1989 and permitted in 2016, handling a maximum of fifty thousand (50,000) gallons per day and filling storage tanks having a capacity equal to or less than twenty-five thousand (25,000) gallons for transferring substances, including but not limited to gasoline and methylene chloride, from one (1) cargo tank (i.e., rail tank car or truck tanker) to another cargo tank (i.e., rail tank car or truck tanker).**
- (e) **One (1) portable shotblasting unit, identified as PSB1, constructed prior to 2004, used to remove rust, rail tank car liners, and other undesirable material from rail tank cars, using a maximum of 1,000 pounds of grit per hour, uncontrolled and exhausting outside the building. [326 IAC 6.8]**

**A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]**

---

This stationary source also includes the following specifically regulated insignificant activities:

- (a) **Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:**
  - (1) **one (1) 5.02 MMBtu/hr natural gas-fired boiler, identified as Boiler B1, constructed after September 21, 1983, used to generate steam for cleaning and facility heat., uncontrolled and exhausting outside the building. [326 IAC 6.8]**
  - (2) **Five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]**
  - (3) **Four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]**

- (b) **Paved roads and parking lots with public access. [326 IAC 6.8-10]**
- (c) **One (1) diesel fuel dispensing facility, identified as DFD, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. [326 IAC 8-9-6]**

~~A.43~~ Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities:

- ~~(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]~~
- (ae) Water based activities, including a**Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume. **[326 IAC 2-7-1(21)(J)(ix)(AA)]**
- ~~(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]~~
- ~~(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute: One (1) portable shotblasting unit used to remove rail tank car liners. [326 IAC 6-3-2][326 IAC 6-8]~~
- ~~(d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: Five (5) space heaters, and five (5) HVAC units.~~

\* \* \* \* \*

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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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. ~~The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

\* \* \* \* \*

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

---

- (a) ~~A~~Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification **required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:**
  - (1) it contains a**~~submitted shall contain~~ certification by an "authorized individual", **as defined by 326 IAC 2-1.1-1(1),** of truth, accuracy, and
  - (2) the completeness.** ~~This certification~~ **states** shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) **The Permittee may use**One (1) certification shall be included, using the attached Certification Form, **or its equivalent**, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

\* \* \* \* \*

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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\*\*\*\*\*

(c) The annual compliance certification report shall include the following:

\*\*\*\*\*

The submittal by the Permittee does require ~~the~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\*\*\*\*\*

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][~~326 IAC 2-8-4(9)~~][~~326 IAC 2-8-5(a)(1)~~]

---

(a) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement~~ Preventive Maintenance **Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum** Plans (PMPs) including the following information on each facility:

\*\*\*\*\*

**The Permittee shall implement the PMPs.**

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit 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 Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies ~~(b):~~

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 **PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**The Permittee shall implement the PMPs.**

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. ~~or potential to emit.~~ The PMPs **and their submittal** do not require ~~the~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (de) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

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\* \* \* \* \*

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

\* \* \* \* \*

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ ~~or~~, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for **Office of Air Quality**, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northwest Regional Office phone: (219) ~~464-0233757-0265~~; fax: (219) ~~464-0553757-0267~~.

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

\* \* \* \* \*

The notification which shall be submitted by the Permittee does not require ~~the~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\* \* \* \* \*

- ~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

\* \* \* \* \*

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

~~Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

**B.156** Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

---

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require ~~at~~ **the certification that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\* \* \* \* \*

**B.1647** Permit Renewal [326 IAC 2-8-3(h)]

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(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(4240). The renewal application does require ~~at~~ **the certification that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\* \* \* \* \*

\* \* \* \* \*

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, **pursuant to 326 IAC 2-8-3(g)**, in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.1748** Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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\* \* \* \* \*

Any such application **does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1)** ~~shall be certified~~ by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\* \* \* \* \*

**B.1849** Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) **and (c)** ~~through (d)~~ without a prior permit revision, if each of the following conditions is met:

\* \* \* \* \*

(4) The Permittee notifies the:

\* \* \* \* \*

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) **and (c)** ~~through (d)~~. The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), ~~(c)(1)~~, and (cd).

- (b) Emission Trades [326 IAC 2-8-15(~~be~~)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(~~be~~).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(~~cd~~)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

~~B.1920~~ Source Modification Requirement [326 IAC 2-8-11.1]

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~~B.2024~~ Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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~~B.2122~~ Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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\*\*\*\*\*

~~Any such~~The application which shall be submitted by the Permittee does require ~~the~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~B.2223~~ Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

---

- (a) The Permittee shall pay annual fees to IDEM, OAQ **no later than** ~~within~~ thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

\*\*\*\*\*

~~B.24~~ Advanced Source Modification Approval [326 IAC 2-8-4(11)][326 IAC 2-1.1-9]

---

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

~~B. 2325~~ Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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C.1 Overall Source Limit [326 IAC 2-8]

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\*\*\*\*\*

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit **any regulated pollutant, except particulate matter (PM), volatile organic compounds (VOCs)** from the entire source shall be limited to less than ~~twenty-five (25) tons per twelve (12) consecutive month period;~~

- ~~(2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. ;~~
- (23) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (34) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

\* \* \* \* \*

- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided **that** the source's potential to emit does not exceed the above specified limits.

\* \* \* \* \*

C.2 Opacity [326 IAC 5-1]

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

\* \* \* \* \*

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

---

The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 IAC 4-2 **or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in and 326 IAC 9-1-2 or in this permit.**

\* \* \* \* \*

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

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

- ~~(a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).~~
- ~~(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).~~
- ~~(c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).~~
- ~~(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.~~
- ~~(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.~~
- ~~(f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.~~
- ~~(g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).~~

- ~~(h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.~~
- ~~(i) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.~~
- ~~(j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).~~
- ~~(k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.~~

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

C.67 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

\* \* \* \* \*

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

\* \* \* \* \*

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\* \* \* \* \*

C.78 Performance Testing [326 IAC 3-6]

- (a) **For performance testing required by this permit,** ~~(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

\* \* \* \* \*

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\* \* \* \* \*

Compliance Requirements [326 IAC 2-1.1-11]

C.89 Compliance Requirements [326 IAC 2-1.1-11]

\* \* \* \* \*

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

~~C.940~~ Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

---

- (a) **For new units:**  
**Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.**
- (b) **For existing units:**  
Unless otherwise specified in this permit, ~~for all monitoring and record-keeping requirements not already legally required, the Permittee shall be allowed up to~~ **implemented within ninety (90) days from the date of permit issuance to begin such monitoring. If, or ninety (90) days of initial start-up, whichever is later. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond the Permittee's control, any monitoring that equipment required by this permit cannot be installed and operated no later than** ~~within~~ **ninety (90) days after permit issuance,** the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

\* \* \* \* \*

The notification which shall be submitted by the Permittee does require ~~the~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

---

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

~~C.1042~~ Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

---

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. **The analog instrument shall be capable of measuring values outside of the normal range.**

\* \* \* \* \*

\* \* \* \* \*

~~C.1143~~ Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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\* \* \* \* \*

~~C.1244~~ Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

---

- (a) ~~Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:~~
- (a) ~~The Permittee shall~~ **take reasonable response steps to** restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing **excess** emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. **The response** ~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or~~

~~exceedance (other than those caused by excused startup or shutdown conditions).  
Corrective actions may include, but isare not limited to, the following:~~

~~\*\*\*\*\*~~

- ~~(2) recording that operations returned **or are returning** to normal without operator action (such as through response by a computerized distribution control system);  
or~~
- ~~(3) any necessary follow-up actions to return operation to **normal or usual manner of operation** within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~

~~\*\*\*\*\*~~

- ~~(e) The Permittee shall **record the reasonable response steps taken**.maintain the following records:
  - ~~(1) — monitoring data;~~
  - ~~(2) — monitor performance data, if applicable; and~~
  - ~~(3) — corrective actions taken.~~~~

~~C.1315~~ Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- ~~(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of ~~its~~these response actions to IDEM, OAQ **no later than seventy-five (75, within thirty (30) days after the date**of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~
- ~~(b) A retest to demonstrate compliance shall be performed **no later than**within one hundred **eighty (180**twenty (120) days **after**of receipt of the **date of the**original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred **eighty (180**twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.~~

~~\*\*\*\*\*~~

~~The response action documents submitted pursuant to this condition do require ~~at~~the certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

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

~~The statement must be submitted to:~~

~~Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

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

~~C.1417~~ General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. **Support information includes the following, where applicable:**
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.
- Records of required monitoring information include the following, where applicable:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

\* \* \* \* \*

- (b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required, **the Permittee** shall be **allowed up to**~~implemented within~~ ninety (90) days **from the date** of permit issuance or ~~the date~~~~ninety (90) days~~ of initial start-up, whichever is later, **to begin such record keeping.**

~~C.1548~~ General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported **except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.**– This report shall be submitted **not later than**~~within~~ thirty (30) days ~~after~~ of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**
- (b) **The address for report submittal is:**
- ~~(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~
- \* \* \* \* \*
- (d) ~~Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (e) — Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

~~C.1649~~ Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

\* \* \* \* \*

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]: **Cleaning Operations**

- (a) One (1) **non-pressurized rail tank car cleaning operation, including one (1) cleaning bay, constructed in 1989, with a maximum throughput capacity of one (1) rail tank car per three (3) hours (equivalent to 0.33 rail tank cars per hour), uncontrolled and venting inside to building B, without controls, which exhausts to vent B.**
- (b) One (1) **truck tanker truck cleaning operation, including two (2) cleaning bays, constructed in 1990, with a maximum throughput capacity of two (2) truck tankers per one (1) hour, each (equivalent to 2.0 truck tankers per hour, total), uncontrolled and venting to inside building A, without controls, which exhausts to vent A.**
- (c) **One (1) pressurized rail tank car purging/degassing operation, including a manifold that allows up to three (3) pressurized rail tank cars to exhaust to the flare at any one time, constructed in 1990, with a maximum throughput capacity of one (1) rail tank car per two (2) hours (equivalent to 1.5 pressurized rail tank cars per hour), with VOC emissions controlled by a flare with one (1) 0.102 MMBtu/hr natural gas-fired pilot, and exhausting outside the building to stack S-1.**
- (d) **One (1) liquid commodity transfer facility, identified as the Transloading Operation, constructed in 1989 and permitted in 2016, handling a maximum of fifty thousand (50,000) gallons per day and filling storage tanks having a capacity equal to or less than twenty-five thousand (25,000) gallons for transferring substances, including but not limited to gasoline and methylene chloride, from one (1) cargo tank (i.e., rail tank car or truck tanker) to another cargo tank (i.e., rail tank car or truck tanker).**

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

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

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

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

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

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

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

#### **D.1.1 Combustion Limitation [40 CFR 63, Subpart EEE][326 IAC 20-28]**

**In order to render the requirements of 40 CFR 63, Subpart EEE (NESHAPs for Hazardous Waste Combustors) and 326 IAC 20-28 not applicable, the Permittee shall not combust hazardous waste, as defined under 40 CFR 261.3, in the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation flare, or each of the non-pressurized rail tank car and truck tanker liquid and dry heel removal stations.**

**Compliance with this requirement shall render the requirements of 40 CFR 63, Subpart EEE, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Waste Combustors and 326 IAC 20-28 not applicable.**

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

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

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

#### **D.1.2 Emission Offset Minor and FESOP Limits: Volatile Organic Compounds (VOC) [326 IAC 2-8] [326 IAC 2-3][326 IAC 8-7]**

**Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) not applicable, the Permittee shall comply with the following:**

- (a) **VOC emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

- (b) For the purpose of this permit, the term "Waste Flammable Liquids" means the residue from a rail tank car or truck tanker that last contained a liquid with a flashpoint less than 140 degrees Fahrenheit (°F) and includes but is not limited to fuels blended from various types of liquid wastes, waste solvents, and other waste organic liquids.

Compliance with these requirements, combined with the potential to emit VOCs from all other emission units at the source, shall limit the source-wide total potential VOC emissions to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), not applicable.

**D.1.3 FESOP Limits: Hazardous Air Pollutants (HAPs) [326 IAC 2-8]**

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (a) Total combined HAPs emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Total individual (any single) HAP emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

**D.1.3-4 Particulate Emission Limitations [326 IAC 6.8-1-2]**

Pursuant to 326 IAC 6.8-1-2, the particulate emissions from the ~~non-pressurized rail tank car cleaning operation, and the Tank Truck tanker cleaning operation,~~ **pressurized rail tank car purging/degassing operation, and transloading operation,** shall ~~not exceed~~ **be limited to less than 0.03 grains per dry standard cubic foot (dscf), each.**

**D.1.4-5 Preventive Maintenance Plan [326 IAC ~~2-8-4(9)~~1-6-3]**

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, is required for these facilities and any associated control devices.~~ **A Preventive Maintenance Plan, is required for these facilities and any associated control devices, in accordance with Section B - Preventive Maintenance Plan, contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition, of this permit, is required for these facilities.**

**Compliance Determination Requirements [326 IAC 2-8-4(1)]**

**D.1.6 Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Control**

In order to assure compliance with Conditions D.1.2(a), D.1.3(a), and D.1.3(b), the Permittee shall comply with the following:

- (a) The flare serving the pressurized rail tank car purging/degassing operation shall be in operation and control VOC and HAP emissions from the pressurized rail tank

**car purging/degassing operation at all times that the pressurized rail tank car purging/degassing operation is purging/degassing rail tank cars.**

- (b) The flare shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications.

For the purpose of this condition, "operation of the flare" shall mean the continuous presence of a pilot flame or equivalent.

#### **D.1.7 Flare Testing**

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In order to demonstrate compliance with Conditions D.1.2(a), D.1.3(a), and D.1.3(b), the Permittee shall perform VOC and HAP testing (after control) at the outlet exhaust of the flare used to control emissions from the pressurized rail tank car purging/degassing operation (including capture efficiency and destruction efficiency) not later than five (5) years from the most recent valid compliance demonstration, utilizing methods approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### **D.1.8 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)**

---

Compliance with the VOC and HAP limitations contained in Conditions D.1.2(a), D.1.3(a), and D.1.3(b), shall be determined as follows:

- (a) Except as otherwise specified in Condition D.1.8(f), compliance with the VOC and HAP limitations in the permit shall be determined using the following equation:

$$E_{TOT} = \sum_{m=1}^{12} (E_{NPR} + E_{TT} + E_{PR} + E_{TO})_m$$

Where:

$E_{TOT}$  = Total Volatile organic compound (VOC), Total Hazardous Air Pollutants (HAP), or Highest Single Hazardous Air Pollutant (HAP) emissions (tons) from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, for a 12 consecutive month period (tons/12-months).

$E_{NPR}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation (tons/month), as calculated in subsection (b), below.

$E_{TT}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the truck tanker cleaning operation (tons/month), as calculated in subsection (c), below.

$E_{PR}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the pressurized rail tank car purging/degassing operation controlled by the flare (tons/month), as calculated in subsection (d), below.

$E_{TO}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the transloading operation (tons/month), as calculated in subsection (e), below.

$m$  = Each month in 12 consecutive month period.

- (b) Except as otherwise specified in Condition D.1.8(f), total VOC, Total HAP, and Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation shall be calculated using the following equation:

$$E_{NPR} = \sum_{y=1}^Y \left[ \left( \sum_{l=1}^L \frac{W_l}{2000 \text{ lbs/ton}} \right) + \left( \sum_{s=1}^S \frac{W_s}{2000 \text{ lbs/ton}} \right) \right]$$

Where:

$E_{NPR}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation (tons/month).

Y = Total VOC, Total HAP, or Highest Single HAP.

y = Each Individual VOC or HAP.

L = Total number of non-pressurized rail tank cars processed in a month that contained a List 1 substance.

l = Each non-pressurized rail tank car processed in a month that contained a List 1 substance.

$W_l$  = List 1 substance specific reporting value (lbs/rail tank car). The reporting values for the List 1 substances are as follows:

- Methanol: 36 pounds per rail tank car.
- Waste Flammable Liquids: 26.0 pound per rail tank car.
- Gasoline, gasoline additives, and naphtha: 16 pounds per rail tank car.
- Methylene chloride: 8.0 pounds per rail tank car.
- Dichlorobenzene: 3.0 pounds per rail tank car.
- Butyl acetate, vinyl acetate, glycols, glycol ethers, glycerin, and formaldehyde: 2.0 pounds per rail tank car.
- Ethyl acetate, ethanol, furfuryl alcohol: 1.5 pound per rail tank car.
- Toluene, xylene, diesel, mineral spirits, methyl ethyl ketone, heptane, hexane, styrene, isopropyl alcohol: 1.0 pound per rail tank car.
- Residues of petroleum products (except gasoline), including but not limited to crude oil, asphalt, diesel fuel, kerosene, and motor oil: 1.0 pound per rail tank car.
- Surfactants, herbicides, pesticides: 0.2 pound per rail tank car.
- Vegetable oils, waxes, soap, and mineral oil result in no VOC or HAP emissions.

S = Total non-pressurized rail tank cars processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.

s = Each non-pressurized rail tank car processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.

$W_s$  = A substance specific reporting value for each VOC or HAP containing substances that was not a List 1 substance shall be 1.0 pound per rail tank car, or shall be calculated assuming that substance vapor concentration is 10% of the lower explosive limit (LEL) using the following equation:

$$W_s = \frac{\left(\frac{LEL_s}{1000}\right) * V * 760 * MW_s}{998.9 * 293.15}$$

Where:

**LEL<sub>s</sub>** = Lower explosive limit (LEL) of substance (expressed as a percentage).

**1000** = Factor to convert to 10% of the LEL.

**V** = Volume of non-pressurized rail tank car (ft<sup>3</sup>).

**760** = Standard pressure (760 mmHg).

**MW<sub>s</sub>** = Molecular weight of substance (lb/lbmole).

**998.9** = Ideal Gas Law Constant (998.9 mmHg- ft<sup>3</sup>/lbmole-K).

**293.15** = Standard temperature (293.15 K).

Calculated W<sub>s</sub> values of less than 0.001 shall be reported as 0.001.

- (c) Except as otherwise specified in Condition D.1.8(f), total VOC, Total HAP, and Highest Single HAP emissions from the truck tanker cleaning operation shall be calculated using the following equation:

$$E_{TT} = \sum_{y=1}^Y \left[ \left( \sum_{l=1}^L \frac{W_l}{2000 \text{ lbs/ton}} \right) + \left( \sum_{s=1}^S \frac{W_s}{2000 \text{ lbs/ton}} \right) \right]$$

Where:

**E<sub>TT</sub>** = Total VOC, Total HAP, or Highest Single HAP emissions from the truck tanker cleaning operation (tons/month).

**Y** = Total VOC, Total HAP, or Highest Single HAP.

**y** = Each Individual VOC or HAP.

**L** = Total number of truck tankers processed in a month that contained a List 1 substance.

**l** = Each truck tanker processed in a month that contained a List 1 substance.

**W<sub>l</sub>** = List 1 substance specific reporting value (lbs/truck tanker). The reporting values for the List 1 substances are as follows:

- Methanol: 10.4 pounds per truck tanker.
- Waste Flammable Liquids: 7.3 pounds per truck tanker.
- Gasoline, gasoline additives, and naphtha: 4.6 pounds per truck tanker.
- Methylene chloride: 2.5 pounds per truck tanker.
- Dichlorobenzene: 1.0 pound per truck tanker.
- Butyl acetate, vinyl acetate, glycols, glycol ethers, glycerin, and formaldehyde: 0.6 pound per truck tanker.
- Ethyl acetate, ethanol, furfuryl alcohol: 0.5 pound per truck tanker.
- Toluene, xylene, diesel, mineral spirits, methyl ethyl ketone, heptane, hexane, styrene, isopropyl alcohol: 0.3 pound per truck tanker.

- Residues of petroleum products (except gasoline), including but not limited to crude oil, asphalt, diesel fuel, kerosene, and motor oil: 0.25 pound per truck tanker.
  - Surfactants, herbicides, pesticides: 0.05 pound per truck tanker.
  - Vegetable oils, waxes, soap, and mineral oil result in no VOC or HAP emissions.
- S** = Total truck tankers processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.
- s** = Each truck tanker processed in a month that contained a VOC or HAP containing substance that was not a List 1 substance.
- W<sub>s</sub>** = A substance specific reporting value for each VOC or HAP containing substances that was not a List 1 substance shall be 0.30 pounds per truck tanker, or shall be calculated assuming that substance vapor concentration is 10% of the lower explosive limit (LEL) using the following equation:

$$W_s = \frac{\left(\frac{LEL_s}{1000}\right) * V * 760 * MW_s}{998.9 * 293.15}$$

Where:

- LEL<sub>s</sub>** = Lower explosive limit (LEL) of substance (expressed as a percentage).
- 1000** = Factor to convert to 10% of the LEL.
- V** = Volume of truck tanker (ft<sup>3</sup>).
- 760** = Standard pressure (760 mmHg).
- MW<sub>s</sub>** = Molecular weight of substance (lb/lbmole).
- 998.9** = Ideal Gas Law Constant (998.9 mmHg- ft<sup>3</sup>/lbmole-K).
- 293.15** = Standard temperature (293.15 K).

Calculated W<sub>s</sub> values of less than 0.001 shall be reported as 0.001.

- (d) Except as otherwise specified in Condition D.1.8(f), total VOC, Total HAP, and Highest Single HAP emissions from the pressurized rail tank car purging/degassing operation controlled by the flare shall be calculated using the following equation:

$$E_{PR} = \sum_{r=1}^R \frac{F * H_r}{2000 \text{ lbs/ton}}$$

Where:

- E<sub>PR</sub>** = Total VOC, Total HAP, or Highest Single HAP emissions from the pressurized rail tank car purging/degassing operation controlled by the flare (tons/month).
- R** = Total number of pressurized rail tank cars processed in a month.
- r** = Each pressurized rail tank car processed in a month.
- F** = Source specific emission rate for the pressurized rail tank car purging/degassing operation controlled by the flare at the flare outlet exhaust established during most recent valid stack test.

Until superseded by the most recent valid stack test, the emission rate of 0.51 pounds VOC or HAP per hour for the pressurized rail tank car purging/degassing operation controlled by the flare at the flare outlet exhaust that was established in the 2012 stack test shall be used.

$H_r$  = Total time spent purging/degassing each pressurized rail tank cars to the flare (hours).

- (e) Except as otherwise specified in Condition D.1.8(f), total VOC, Total HAP, and Highest Single HAP emissions from the transloading operation shall be calculated using the following equation:

$$E_{TO} = \sum_{x=1}^X \left( \frac{12.46 * S_i * P_i * M_i * G_i}{T_i * \left( 1000 \frac{\text{gallons}}{\text{kgal}} \right) * (2000 \text{ lbs/ton})} \right)_x$$

Where:

- $E_{TO}$  = Total VOC, Total HAP, or Highest Single HAP emissions from the transloading operation (tons/month).  
 $X$  = Total number of rail tank cars or tanker trailers transloaded in a month.  
 $x$  = Each rail tank car or tanker trailer transloaded in a month.  
12.46 = Factor to convert to units of lb/kgal of liquid loaded.  
 $i$  = Each specific liquid transloaded in a month.  
 $S_i$  = Saturation factor for type of liquid loading (AP 42, Table 5.2-1)  
 $P_i$  = True vapor pressure of liquid loaded (psia) from AP 42, Table 7.1-2 (or other valid source of chemical data)  
 $M_i$  = Average molecular weight of Total VOC, Total HAP, or Highest Single HAP vapors (lb/lb-mole) emitted from specific liquid loaded (AP 42, Table 7.1-2 or other source of chemical data)  
 $T_i$  = Temperature of liquid loaded °R (°F +460)  
 $G_i$  = Total volume of liquid loaded into each rail tank car or tanker trailer (gallons).

- (f) As an alternative to calculating Highest Single HAP emissions using the equations in Conditions D.1.8(a) through D.1.8(e), the Permittee may determine compliance with the Single HAP emission limitation in Condition D.1.3(b) using the Total HAP emissions for any month that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period.

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

##### D.1.9 Parametric Monitoring

In order to assure compliance with Conditions D.1.6, the Permittee shall comply with the following:

- (a) A presence of flame detection device, such as an ultraviolet beam sensor, a thermocouple, a flame ionization detector, or other equivalent device, shall be installed at the pilot light or the flame itself to indicate the continuous presence of a flame, and shall be calibrated, maintained, and operated in conjunction with the flare according to the manufacturer's specifications.

- (b) The flare shall be monitored to detect the presence of a flame while the pressurized rail tank car purging/degassing operation is in operation; and**
- (c) The total amount of elapsed time per each occurrence that the pressurized rail tank car purging/degassing operation is vented to the flare shall be recorded.**

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

**D.1.5-10** Record Keeping Requirements

- 
- ~~(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (4) below. Records maintained for (1) and (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Conditions D.1.1 and D.1.2. The Permittee shall maintain records of the:
    - ~~(1) Calendar dates covered in the compliance determination period;~~
    - ~~(2) Number of railcars and tank trucks, containing VOCs, cleaned at the source;~~
    - ~~(3) Number of railcars and tank trucks, containing HAPs, cleaned at the source;~~
    - ~~(3) Contents of all tank trucks and railcars cleaned; and~~
    - ~~(4) Vapor pressures of the contents (if the contents are volatile organic compounds).~~~~
  - (a) To document the compliance status with Conditions D.1.2(a), D.1.3(a), D.1.3(b), and D.1.8, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Conditions D.1.2(a), D.1.3(a), and D.1.3(b).**
    - (1) Calendar dates covered in the compliance determination period.**
    - (2) Data and parameter values used in the calculations required by Condition D.1.8, including the following:
      - (A) The types of substances/materials/liquids processed each month in the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the types, VOC content, and HAP content of substances/materials/liquids processed.**
      - (B) Total number of non-pressurized rail tank cars and truck tankers processed each month that contained a List 1 substance specified in D.1.8(b) and D.1.8(c).**
      - (C) Total number of non-pressurized rail tank cars and truck tankers processed each month that contained a VOC or HAP containing substance that was not a List 1 substance specified in D.1.8(b) and D.1.8(c).**
      - (D) The substance specific reporting value used for each VOC and HAP containing substances processed each month, including any supporting calculations and parameter values as specified in D.1.8(b) and D.1.8(c).****

- (E) Total number of pressurized rail tank cars processed in a month.
- (F) Total hours spent purging/degassing each pressurized rail tank car to the flare each month.
- (E) Total number of rail tank cars or tanker trailers transloaded each month.
- (G) Total gallons of each liquid transloaded each month.
- (3) The Total VOC and Total HAP emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, each month and each compliance period.
- (4) The Permittee shall maintain records of the Highest Single HAP emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, each month and each compliance period for any month that the Total HAP emissions exceed 9.5 tons per twelve (12) consecutive month period.
- (5) The Permittee is not required to maintain records of the Highest Single HAP emissions for that month and for that compliance period for any month that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period.
- (b) To document the compliance status with Conditions D.1.6 and D.1.9, the Permittee shall maintain the following records for the pressurized rail tank car purging/degassing operation flare:
  - (1) Copies of the manufacturer's specifications for the flare and presence of flame detection device.
  - (2) Calibration data and maintenance records for the flare and presence of flame detection device.
  - (3) Presence of flame readings for the presence of flame detection device. The Permittee shall include in its record when a presence of flame reading is not taken and the reason for the lack of a presence of flame reading (e.g., the unit was down for maintenance).
  - (4) The start and stop times for each pressurized rail tank car venting to the flare, sufficient to establish the total time spent purging/degassing each pressurized rail tank car to the flare (hours).
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

#### **D.1.11 Reporting Requirements**

The Permittee shall comply with the following reporting requirements:

- (a) Quarterly summaries of the information to document the compliance status with the Total VOC and Total HAP emission limitations in Conditions D.1.2(a), D.1.3(a), and Condition D.1.8, shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of

the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

- (b) **A quarterly summary of the information to document the compliance status with the Highest Single HAP emission limitation in Condition D.1.3(b) and Condition D.1.8, shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. For any compliance period that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period, the Permittee may specify in the quarterly summary that the Total HAP emissions were less than or equal to 9.5 tons per twelve (12) month period as an alternative to specifying the Highest Single HAP emissions. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
- (cb) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit~~ **contains the Permittee's obligation with regard to the records required by this condition.**

**D.1.6-11 Reporting Requirements**

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**The Permittee shall comply with the following reporting requirements:**

- (a) ~~A quarterly summary of the information used to document the compliance status with the Total VOC and Total HAP emission limitations in Conditions D.1.42(a), D.1.3(a), and D.1.28, in any compliance period shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, no later than within thirty (30) days after the end of the quarter being reported.~~ **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
- (b) **A quarterly summary of the information to document the compliance status with the Highest Single HAP emission limitation in Condition D.1.3(b) and Condition D.1.8, shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. For any compliance period that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period, the Permittee may specify in the quarterly summary that the Total HAP emissions were less than or equal to 9.5 tons per twelve (12) month period as an alternative to specifying the Highest Single HAP emissions. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

\* \* \* \* \*

## SECTION D.2 — EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

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

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

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

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

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

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

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

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

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

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

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

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

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

### Compliance Determination Requirements

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

In order comply with Condition D.2.1:

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

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

#### D.2.5 — Volatile Organic Compound (VOC) Emissions Calculations

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

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

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

Where:

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

Time<sub>i</sub> = The elapsed time that the railcar is vented/purged at a particular flow rate, in minutes.

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

#### D.2.6 — Flare Testing

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

#### D.2.7 — Agreed Order 2006-16020-A

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

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

~~D.2.8 Flare Pilot Flame~~

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

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

~~D.2.9 Record Keeping Requirements~~

~~(a) In order to comply with Condition D.2.1(a), the Permittee shall keep the following records of operation of the Pressurized Railcar Purging/Degassing operation:~~

- ~~(1) Gas flow rate during all purging/degassing operations;~~
- ~~(2) Total elapsed time at each gas flow rate during all purging/degassing operations; and~~
- ~~(3) Total VOC/HAP emissions for each railcar purged/degassed.~~

~~(b) To document compliance with Condition D.2.1(b), the Permittee shall maintain records of the:~~

- ~~(1) Contents of all railcars cleaned; and~~
- ~~(2) Vapor pressures of the contents (if the contents are volatile organic compounds).~~

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

~~D.2.10 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.2.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

\* \* \* \* \*

SECTION D.23 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]: **Shotblasting**

- ~~(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]~~
- ~~(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]~~
- ~~(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute: One (1) portable shotblasting unit used to remove railcar liners. [326 IAC 6-3-2][326 IAC 6.8]~~
- (e) One (1) portable shotblasting unit, identified as PSB1, constructed prior to 2004, used to remove rust, rail tank car liners, and other undesirable material from rail tank cars, using a maximum of 1,000 pounds of grit per hour, uncontrolled and exhausting outside the building. [326 IAC 6.8]**

**Specifically Regulated insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]**

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:**
  - (1) One (1) 5.02 MMBtu/hr natural gas-fired boiler, identified as Boiler B1, constructed after September 21, 1983, used to generate steam for cleaning and facility heat, uncontrolled and exhausting outside the building. [326 IAC 6.8]**
  - (2) Five (5) 0.050 MMBtu/hr natural gas-fired, direct-fired HVAC units, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]**
  - (3) Four (4) 0.250 MMBtu/hr natural gas-fired, direct-fired heaters, constructed in 1989, uncontrolled and exhausting outside the building. [326 IAC 6.8]**
- (b) Paved roads and parking lots with public access. [326 IAC 6.8-10]**
- (c) Four (4) diesel fuel dispensing facilities, identified as DFD1 through DFD4, having a combined total storage tank capacity of less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less, combined. [326 IAC 8-9-6]**

\* \* \* \* \*

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

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

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

**D.2.1 Particulate Emission Limitations [326 IAC 6.8-11]**

**In order to render the requirements of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures) not applicable, the Permittee shall comply with the following:**

- (a) Operation of the portable shotblasting unit (PSB1) shall not exceed 2,675 hours per twelve (12) consecutive month period, with compliance determined at the end of each month; and**
- (b) PM10 emissions from the portable shotblasting unit (PSB1) shall not exceed 7.00 pounds per hour (lbs/hr).**

**Compliance with these limits, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than ten (10) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures) not applicable.**

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

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

~~demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.~~

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

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

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

- (a) Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the portable shotblasting unit (PSB1) and associated and spent media cleanout shall not exceed 0.03 grains per dry standard cubic foot (dscf).
- (b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate emissions from the 5.02 MMBtu/hr natural gas-fired boiler (Boiler B1) shall not exceed 0.01 grains per dry standard cubic foot (dscf).
- (c) Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the five (5) direct-fired HVAC units and four (4) direct-fired heaters, shall not exceed 0.03 grains per dry standard cubic foot (dscf), each.

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

**D.2.3 Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 8-9]**

- (a) To document the compliance status with Condition D.2.1(a), the Permittee shall maintain monthly records of the hours of operation of the portable shotblasting unit (PSB1).
- (b) Pursuant to 326 IAC 8-9-6(a), the Permittee shall keep all records required by this section, for the diesel fuel storage tank, for three (3) years unless specified otherwise. Records required by subsection (b) shall be maintained for the life of the vessel.
- (c) Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record and submit to the department a report, for the diesel fuel storage tanks, containing the following information for the vessel:
  - (1) The vessel identification number.
  - (2) The vessel dimensions.
  - (3) The vessel capacity.
- (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**D.2.4 Reporting Requirements**

A quarterly summary of the information to document the compliance status with Condition D.2.1(a), shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\* \* \* \* \*

EMERGENCY OCCURRENCE REPORT

This form consists of 2 pages

Page 1 of 2

<p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) <b>daytime</b> business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul>
---

\* \* \* \* \*

A certification is not required for this report.

\* \* \* \* \*

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

~~FESOP Quarterly Report~~

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

YEAR: \_\_\_\_\_

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

\_\_\_\_\_  No deviation occurred in this quarter.  
\_\_\_\_\_  Deviation/s occurred in this quarter.  
\_\_\_\_\_ Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

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

~~FESOP Quarterly Report - Cleaning Operations~~

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

~~YEAR: \_\_\_\_\_~~

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

~~No deviation occurred in this quarter.~~

~~Deviation/s occurred in this quarter.~~

~~Deviation has been reported on: \_\_\_\_\_~~

~~Submitted by: \_\_\_\_\_~~

~~Title / Position: \_\_\_\_\_~~

~~Signature: \_\_\_\_\_~~

~~Date: \_\_\_\_\_~~

~~Phone: \_\_\_\_\_~~

~~\_\_\_\_\_ Attach a signed certification to complete this report.~~

\* \* \* \* \*

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

**FESOP Quarterly Report**

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

YEAR: \_\_\_\_\_

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

\_\_\_\_\_  No deviation occurred in this quarter.

\_\_\_\_\_  Deviation/s occurred in this quarter.

\_\_\_\_\_ Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

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

**FESOP Quarterly Report - Cleaning Operations**

**Source Name:** United Transportation Group  
**Source Address:** 1150 E. 145th Street, East Chicago, Indiana 46312  
**FESOP Permit No.:** F089-37256-00469  
**Facility:** Non-Pressurized Rail Tank Car Cleaning Operation, Truck Tanker Cleaning Operation, Pressurized Rail Tank Car Purging/Degassing Operation, and Transloading Operation  
**Parameter:** Volatile Organic Compound (VOC) Emissions.  
**Limit:** VOC emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, pursuant to the requirements of in Condition D.1.8.

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

**Submitted by:** \_\_\_\_\_

**Title / Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

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

**FESOP Quarterly Report - Cleaning Operations**

**Source Name:** United Transportation Group  
**Source Address:** 1150 E. 145th Street, East Chicago, Indiana 46312  
**FESOP Permit No.:** F089-37256-00469  
**Facility:** Rail Tank Car and Truck Tanker Cleaning Operations  
**Parameter:** Total Combined Hazardous Air Pollutant (HAP) Emissions.  
**Limit:** Total combined HAPs emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, pursuant to the requirements of in Condition D.1.8.

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Total Combined HAP Emissions (tons)	Total Combined HAP Emissions (tons)	Total Combined HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

**Submitted by:** \_\_\_\_\_

**Title / Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

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

### FESOP Quarterly Report - Cleaning Operations

**Source Name:** United Transportation Group  
**Source Address:** 1150 E. 145th Street, East Chicago, Indiana 46312  
**FESOP Permit No.:** F089-37256-00469  
**Facility:** Rail Tank Car and Truck Tanker Cleaning Operations  
**Parameter:** Highest Individual Hazardous Air Pollutant (HAP) Emissions.  
**Limit:** Total individual (any single) HAP emissions from the non-pressurized rail tank car cleaning operation, truck tanker cleaning operation, pressurized rail tank car purging/degassing operation, and transloading operation, combined, shall not exceed 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, pursuant to the requirements of in Condition D.1.8.

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

For any compliance period that the Total HAP emissions are less than or equal to 9.5 tons per twelve (12) consecutive month period, the Permittee may specify in the table below that the Total HAP emissions were less than or equal to 9.5 tons per twelve (12) month period as an alternative to specifying the Highest Single HAP emissions.

Month	Total HAP emissions were less than or equal to 9.5 tons per twelve (12) month period (Yes/No)	Individual HAP Being Reported For This Month	Column 1	Column 2	Column 1 + Column 2
			Total Individual HAP Emissions (tons)	Total Individual HAP Emissions (tons)	Total Individual HAP Emissions (tons)
			This Month	Previous 11 Months	12 Month Total

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

**Submitted by:** \_\_\_\_\_

**Title / Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report - Shotblasting**

**Source Name:** United Transportation Group  
**Source Address:** 1150 E. 145th Street, East Chicago, Indiana 46312  
**FESOP Permit No.:** F089-37256-00469  
**Facility:** Portable Shotblasting Unit (PSB1)  
**Parameter:** Hours of Operation  
**Limit:** Operation of the portable shotblasting unit (PSB1) shall not exceed 2,675 hours per twelve (12) consecutive month period, with compliance determined at the end of each month.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

**Submitted by:** \_\_\_\_\_  
**Title / Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

## QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: United Transportation Group  
Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312  
Mailing Address: ~~1150 E. 145th Street, East Chicago, IN 46312~~  
FESOP Permit No.: F089-3725627287-00469

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting.** Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

\* \* \* \* \*

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. A permit renewal application for the purposes of this review was received on June 1, 2016. On September 23, 2015 UTG submitted a FESOP Significant Permit Revision (SPR) application and requested that the SPR application be combined into and processed as part of this renewal. Additional information was received September 28, 2015 through August 18, 2016.

The continued operation of this existing rail tank car and truck tank cleaning facility shall be subject to the conditions of the attached proposed FESOP Renewal with New Source Review No. 089-37256-00469. The staff recommends to the Commissioner that this FESOP Renewal with New Source Review be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 233-9327 or toll free at 1-800-451-6027 extension 3-9327.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Emissions Summary**

**Company Name:** United Transportation Group  
**Address City IN Zip:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit Number:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

Unlimited / Uncontrolled Potential Emissions (tons/yr)										
Emissions Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	"Worst" Single HAP <sup>(1)</sup>	
Non-pressurized Rail Tankcar Cleaning Operation	0.66	0.16	0.16	--	--	48.40	--	95.11	93.43	(MeCl)
Truck Tanker Cleaning Operation				--	--	89.22	--	170.89	163.34	(MeCl)
Pressurized Rail Tankcar Purging/Degassing Operation (Flare)	0.01	0.01	0.01	2.63E-04	0.04	111.69	0.04	8.27E-04	7.88E-04	(hexane)
Transloading Operation	0	0	0	0	0	60.98	0	60.98	60.98	(MeCl)
Portable Shotblasting Unit (SB1) and Spent Media Cleanout	22.23	15.41	15.41	0	0	0	0	0	0	
Natural Gas Combustion - Boiler B1	0.041	0.16	0.16	0.013	2.16	0.119	1.81	0.041	0.039	(hexane)
Natural Gas Combustion - Insignificant HVAC Units & Heaters	0.010	0.041	0.041	3.22E-03	0.54	0.030	0.45	0.010	0.010	(hexane)
Diesel Fuel Dispensing <sup>(2)</sup>	0	0	0	0	0	negl.	0	negl.	negl.	
<b>Total ducted/ductable emissions:</b>	<b>22.95</b>	<b>15.78</b>	<b>15.78</b>	<b>0.016</b>	<b>2.74</b>	<b>310.44</b>	<b>2.30</b>	<b>327.04</b>	<b>317.75</b>	<b>(MeCl)</b>
Fugitive Emissions (paved roads)	1.11	0.22	0.05	--	--	--	--	--	--	--
<b>Total:</b>	<b>24.06</b>	<b>16.00</b>	<b>15.84</b>	<b>0.016</b>	<b>2.74</b>	<b>310.44</b>	<b>2.30</b>	<b>327.04</b>	<b>317.75</b>	<b>(MeCl)</b>

Total emissions based on rated capacity at 8,760 hours/year.

- (1) The specific HAPs that may potentially be emitted will vary depending upon the contents of the rail tank cars. However, Federally enforceable limits will ensure that HAPs are limited to below Title V levels.
- (2) The Diesel Fuel Dispensing (DFD) potential emissions have been evaluated using the US EPA TANKS Program (version 4.09) and determined negligible (negl.).

Limited / Uncontrolled Potential Emissions (tons/yr)										
Emissions Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	"Worst" Single HAP	
Non-pressurized Rail Tank Car Cleaning Operation	0.66	0.16	0.16	--	--	< 24.5 <sup>(1)</sup>	--	< 24.5 <sup>(2)</sup>	< 9.5 <sup>(2)</sup>	(any)
Truck Tanker Cleaning Operation				--	--		--			
Pressurized Rail Tank Car Purging/Degassing Operation (Flare)	0.01	0.01	0.01	2.63E-04	0.04		0.04			
Transloading Operation	0	0	0	0	0	0	0	0	0	
Portable Shotblasting Unit (SB1) and Spent Media Cleanout <sup>(3)</sup>	13.38	9.36	9.36	0	0	0	0	0	0	
Natural Gas Combustion - Boiler B1	0.041	0.16	0.16	0.013	2.16	0.12	1.81	0.041	0.039	(hexane)
Natural Gas Combustion - Insignificant HVAC Units & Heaters	0.010	0.041	0.041	3.22E-03	0.54	0.030	0.45	0.010	0.010	(hexane)
Diesel Fuel Dispensing <sup>(4)</sup>	0	0	0	0	0	negl.	0	negl.	negl.	
<b>Total ducted/ductable emissions:</b>	<b>14.09</b>	<b>9.74</b>	<b>9.74</b>	<b>0.016</b>	<b>2.74</b>	<b>24.65</b>	<b>2.30</b>	<b>24.55</b>	<b>9.55</b>	<b>(any)</b>
Fugitive Emissions (paved roads)	1.11	0.22	0.05	--	--	--	--	--	--	--
<b>Total</b>	<b>15.20</b>	<b>9.96</b>	<b>9.79</b>	<b>0.016</b>	<b>2.74</b>	<b>24.65</b>	<b>2.30</b>	<b>24.55</b>	<b>9.55</b>	<b>(any)</b>

- (1) Limited PTE to assure compliance with the requirements of 326 IAC 2-8 (FESOP), and render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) not applicable.
- (2) Limited PTE to assure compliance with the requirements of 326 IAC 2-8 (FESOP), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.
- (3) Limited PTE to assure compliance with the requirements of 326 IAC 2-8 (FESOP), and render the requirements of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures) not applicable.
- (4) The Diesel Fuel Dispensing potential emissions have been evaluated using the US EPA TANKS Program (version 4.09) and determined negligible (negl.).

**Appendix A: Emissions Calculations  
Non-pressurized Rail Tank Car Cleaning Operation**

# of railcar cleaning bays	1.0	cleaning bays
Process Rate <sup>(1)</sup>	3.0	hours/railcar/cleaning bay
Maximum Throughput <sup>(1)</sup>	0.333	rail tank cars cleaned/hour
Maximum Throughput <sup>(1)</sup>	2,920	rail tank cars cleaned/year

**Company Name:** United Transportation Group  
**Address City IN Zip:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit No.:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

Uncontrolled Potential Emissions (tons/year)																												
Category		Substance																										
		2-Butoxyethanol <sup>(4)</sup>	2-Ethoxyethanol	2-Methoxyethanol	Benzene	Butyl Acetate <sup>(2)</sup>	Dichlorobenzene	Ethanol	Ethyl Acetate <sup>(2)</sup>	Glycol Ethers	Formaldehyde	Furfuryl Alcohol <sup>(2)</sup>	Hexane	Isopropyl Alcohol <sup>(2)</sup>	Methylene Chloride (MeCl) <sup>(3)</sup>	Methyl ethyl ketone (MEK) <sup>(2)</sup>	Methanol	Toluene	Vinyl Acetate	Xylene	Diesel <sup>(2)</sup>	Gasoline	Glycerol (glycerin) <sup>(2)</sup>	Kerosene <sup>(4)</sup>	Styrene	Waste Flammables <sup>(5)</sup>	Worst Case Substance PTE	
Criteria Pollutants	LEL (percent (%) by volume of air) <sup>(6)</sup>	1.1	1.7	1.8	1.2	1.7	2.5	3.3	2.0	3.2	7.0	1.8	1.1	2.0	13.0	1.4	6.0	1.1	2.6	0.9	0.6	1.4	2.6	0.7	0.9	1.5	13.00	
	Volume of Railcar (cubic feet)	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	3,209	
	Atmospheric Pressure (mmHg)	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760
	Molecular Weight of substance (lb-mole)	118	92	76	78	116	147	46.1	88	62	30	98	86.2	60	85	72	32	92.1	86	106.2	130	68	92	130	104	100	147	
	VOC Potential Emissions (Ws) (lbs/car) <sup>(7)</sup>	1.08	1.30	1.14	0.78	1.64	3.06	1.27	1.47	1.65	1.75	1.47	0.79	1.00	0.00	0.84	32.00	0.84	1.86	0.80	0.65	15.87	1.99	0.76	0.78	25.00	32.00	
	VOC Potential Emissions (lbs/hr)	0.36	0.43	0.38	0.26	0.55	1.02	0.42	0.49	0.55	0.58	0.49	0.26	0.33	0.00	0.28	10.67	0.28	0.62	0.27	0.22	5.29	0.66	0.25	0.26	8.33	10.67	
	VOC Potential Emissions (tons/yr)	1.58	1.90	1.66	1.14	2.40	4.47	1.85	2.14	2.41	2.55	2.15	1.15	1.46	0.00	1.23	46.72	1.23	2.72	1.16	0.95	23.16	2.91	1.11	1.14	36.50	46.72	
Hazardous Air Pollutant (HAP) Content	Weight % Benzene	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2.90E-04%	0.92%	0%	0%	0%	100%	100%	
	Weight % Biphenyl	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6.30E-04%	0%	0%	0%	0%	0%	6.3E-04%	
	Weight % Dichlorobenzene	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	
	Weight % Ethanol	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	
	Weight % Ethylbenzene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.07%	0.08%	0%	0%	0%	0%	100.00%	
	Weight % Fluorene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	8.60E-04%	0%	0%	4.20E-05%	0%	0%	8.6E-04%	
	Weight % Formaldehyde	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	
	Weight % Glycol Ether	0%	100%	100%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%
	Weight % n-Hexane	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.82%	0%	0%	0%	0%	100%
	Weight % Isopropyl benzene (Cumene)	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.01%	0%	0%	0%	0%	100%
	Weight % MeCl	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%
	Weight % Methanol	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	200%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	200%
	Weight % MTBE	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	16.24%	0%	0%	0%	0%	100%
	Weight % Naphthalene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.26%	0%	0%	31%	0%	0%	31.0%
	Weight % Phenanthrene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	8.80E-04%	0%	0%	8.60E-06%	0%	0%	8.8E-04%
	Weight % Styrene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	100%	100%	
	Weight % Toluene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0.18%	0.32%	0%	0%	0%	0%	100%	
Weight % Vinyl acetate	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	100%		
Weight % Xylenes	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0.50%	0.32%	0%	0%	0%	0%	100%		

**Appendix A: Emissions Calculations  
Non-pressurized Rail Tank Car Cleaning Operation**

# of railcar cleaning bays	1.0	cleaning bays
Process Rate <sup>(1)</sup>	3.0	hours/railcar/cleaning bay
Maximum Throughput <sup>(1)</sup>	0.333	rail tank cars cleaned/hour
Maximum Throughput <sup>(1)</sup>	2,920	rail tank cars cleaned/year

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		Uncontrolled Potential Emissions (tons/year)																										
		Substance																										
Category		2-Butoxyethanol <sup>(4)</sup>	2-Ethoxyethanol	2-Methoxyethanol	Benzene	Butyl Acetate <sup>(2)</sup>	Dichlorobenzene	Ethanol	Ethyl Acetate <sup>(2)</sup>	Glycol Ethers	Formaldehyde	Furfuryl Alcohol <sup>(2)</sup>	Hexane	Isopropyl Alcohol <sup>(2)</sup>	Methylene Chloride (MeCl) <sup>(3)</sup>	Methyl ethyl ketone (MEK) <sup>(2)</sup>	Methanol	Toluene	Vinyl Acetate	Xylene	Diesel <sup>(2)</sup>	Gasoline	Glycerol (glycerin) <sup>(2)</sup>	Kerosene <sup>(4)</sup>	Styrene	Waste Flammables <sup>(5)</sup>	Worst Case Substance PTE	
Hazardous Air Pollutant (HAP) Emissions	Benzene Emissions (tons/yr)	0	0	0	1.14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2.75E-04	0.213	0	0	0	36.50	36.50
	Biphenyl Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5.98E-04	0	0	0	0	0	5.98E-04
	Dichlorobenzene Emissions (tons/yr)	0	0	0	0	0	4.47	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4.47
	Ethanol Emissions (tons/yr)	0	0	0	0	0	0	1.85	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	36.50	36.50
	Ethylbenzene Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6.64E-04	1.85E-02	0	0	0	36.50	36.50
	Fluorene Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8.16E-04	0	0	4.65E-05	0	0	8.16E-04
	Formaldehyde Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	2.55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	36.50	36.50
	Glycol Ethers Emissions (tons/yr)	0	1.90	1.66	0	0	0	0	0	0	2.41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2.41
	Hexane Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	1.15	0	0	0	0	0	0	0	0	1.90E-01	0	0	0	36.50	36.50
	Isopropyl benzene (Cumene) Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2.32E-03	0	0	0	36.50	36.50
	MeCl Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13.44	0	0	0	0	0	0	0	0	0	0	0	13.44
	Methanol Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	93.43	0	0	0	0	0	0	0	0	36.50	93.43
	MTBE Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3.76	0	0	0	36.50	36.50
	Naphthalene Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2.47E-03	0	0	0.34	0	0	0.34
	Phenanthrene Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8.35E-04	0	0	9.52E-06	0	0	8.35E-04
	Styrene Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1.13873	36.50	36.50
	Toluene Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1.23	0	0	1.71E-03	7.41E-02	0	0	0	36.50	36.50
	Vinyl acetate Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2.72	0	0	0	0	0	0	36.50	36.50
	Xylenes Emissions (tons/yr)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1.16	4.74E-03	7.41E-02	0	0	0	36.50	36.50
	<b>Totals</b>	<b>0</b>	<b>1.90</b>	<b>1.66</b>	<b>1.14</b>	<b>0</b>	<b>4.47</b>	<b>1.85</b>	<b>0</b>	<b>2.41</b>	<b>2.55</b>	<b>0</b>	<b>1.15</b>	<b>0</b>	<b>13.44</b>	<b>0</b>	<b>93.43</b>	<b>1.23</b>	<b>2.72</b>	<b>1.16</b>	<b>0.012</b>	<b>4.33</b>	<b>0</b>	<b>0.34</b>	<b>1.14</b>	<b>36.50</b>	<b>93.43</b>	
		<i>(Total emissions based on rated capacity at 8,760 hours/year.)</i>																										
		<b>PTE of Highest HAP (Worse Case Substance)</b>																										
		<b>MeCl</b>																										

**Notes**

- It takes 3 hrs to clean one (1) non-pressurized railcar, and United Transportation Group (UTG) has only one (1) service bay to clean non-pressurized rail tank cars. Therefore, the maximum throughput is 1/3 non-pressurized rail tank cars per hour.
- Substance is not a hazardous air pollutant (HAP)
- Methylene chloride (MeCl), also known as Dichloromethane, has been determined to have negligible photochemical reactivity and therefore not a VOC by the EPA. Source: "Volatile Organic Compounds" Definition per 40 CFR Part 51.100(s) (as of October 30, 2014)
- Source: Petroleum Liquids, Potter, T.L. and K.E. Simmons. 1998. Total Petroleum Hydrocarbon Criteria Working Group Series, Volume 2. Composition of Petroleum Mixtures. The Association for Environmental Health and Science.
- Waste Flammable Liquid means the residue from a tank truck or railcar that last contained a liquid with a flashpoint less than 140 °F and includes but is not limited to fuels blended from various types of liquid wastes, waste solvents, and other waste organic liquids.
- Source: LEL (percent (%) by volume of air) taken from the NIOSH Pocket Guide to Chemical Hazards (<http://www.cdc.gov/niosh/npg/>), except for the Glycol ethers, diesel, and glycerol, which were provided by the source.
- To form a conservative estimate, methanol, gasoline, and waste flammables were calculated at 200% of the LEL. See the "Emissions Calculations" section of the TSD (pages 4 and 5 of 59) for more detail.

**Methodology**

VOC Potential Emissions (Ws) (lbs/car) are calculated from the Ideal Gas Law as follows:

$$W_s = \frac{\left(\frac{LEL}{1000}\right) * V * 760 * MW_s}{989.9 * 293.15}$$

Where:

- LELs = Lower explosive limit (LEL) of substance (expressed as a percentage).
- 1000 = Factor to convert to 10% of the LEL.
- V = Volume of non-pressurized rail tank car (ft3).
- 760 = Standard pressure (760 mmHg).
- MWs = Molecular weight of substance (lb/lbmole).
- 989.9 = Ideal Gas Law Constant (989.9 mmHg-ft3/lbmole-K).
- 293.15 = Standard temperature (293.15 K).

Except for methanol, gasoline, and waste flammables, which were calculated as follows:

$$W_g = \frac{\left(\frac{LEL_g}{100}\right) * (200) * V * 760 * MW_g}{989.9 * 293.15}$$

Where:

- LEL<sub>g</sub> = Lower explosive limit (LEL) of substance (expressed as a percentage).
- 200 = Factor to convert to 200% of the LEL.
- V = Volume of non-pressurized rail tank car (ft3).
- 760 = Standard pressure (760 mmHg).
- MW<sub>g</sub> = Molecular weight of substance (methanol, gasoline, and waste flammable) (lb/lbmole).
- 989.9 = Ideal Gas Law Constant (989.9 mmHg-ft3/lbmole-K).
- 293.15 = Standard temperature (293.15 K).

VOC Potential Emissions (lbs/hr) = [VOC Potential Emissions (Ws) (lbs/car) \* Maximum Throughput (rail tank cars cleaned/hour)]

VOC Potential Emissions (tons/yr) = [VOC Potential Emissions (lbs/hr) \* 8760 hrs/yr \* 1 ton/2000 lbs]

Individual Hazardous Air Pollutant (HAP) Emissions (tons/yr) = [VOC Potential Emissions (tons/yr) \* Weight % HAP]

Total Combined Hazardous Air Pollutant (HAP) Emissions (tons/yr) = [SUM(Individual Hazardous Air Pollutant (HAP) Emissions (tons/yr))]

**Appendix A: Emissions Calculations  
Truck Tanker Cleaning Operation**

# of truck tanker cleaning bays	2.0	cleaning bays
Process Rate <sup>(1)</sup>	1.0	hours per truck tanker
Maximum Throughput <sup>(1)</sup>	2.0	truck tankers cleaned/hour
Maximum Throughput <sup>(1)</sup>	17,520	truck tankers cleaned/year

**Company Name:** United Transportation Group  
**Address City IN Zip:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit No.:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

Uncontrolled Potential Emissions (tons/year)																													
Category		Substance																											
		2-Butoxyethanol <sup>(2)</sup>	2-Ethoxyethanol	2-Methoxyethanol	Benzene	Butyl Acetate <sup>(2)</sup>	Dichlorobenzene	Ethanol	Ethyl Acetate <sup>(2)</sup>	Glycol Ethers	Formaldehyde	Furfuryl Alcohol <sup>(2)</sup>	Hexane	Isopropyl Alcohol <sup>(2)</sup>	Methylene Chloride (MeCl) <sup>(3)</sup>	Methyl ethyl ketone (MEK) <sup>(2)</sup>	Methanol	Toluene	Vinyl Acetate	Xylene	Diesel <sup>(4)</sup>	Gasoline	Glycerol (glycerin) <sup>(2)</sup>	Kerosene <sup>(4)</sup>	Styrene	Waste Flammables <sup>(5)</sup>	Worst Case Substance PTE		
Criteria Pollutants	LEL (percent (%) by volume of air) <sup>(6)</sup>	1.1	1.7	1.8	1.2	1.7	2.5	3.3	2.0	3.2	7.0	1.8	1.1	2.0	13.0	1.4	6.0	1.1	2.6	0.9	0.6	1.4	2.6	0.7	0.9	1.5	13.00		
	Volume of Truck Tanker (cubic feet)	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936	936		
	Atmospheric Pressure (mmHg)	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	760	
	Molecular Weight of substance (lb-lbmole)	118	92	76	78	116	147	46.1	88	62	30	98	86.2	60	85	72	32	92.1	86	106.2	130	68	92	130	104	100	147		
	VOC Potential Emissions (Wts) (lbs/tanker) <sup>(7)</sup>	0.32	0.38	0.33	0.23	0.48	0.89	0.37	0.43	0.48	0.51	0.43	0.23	0.29	0.00	0.24	9.32	0.25	0.54	0.23	0.19	4.62	0.58	0.22	0.23	7.28	9.32		
	VOC Potential Emissions (lbs/hr)	0.63	0.76	0.66	0.45	0.96	1.78	0.74	0.85	0.96	1.02	0.86	0.46	0.58	0.00	0.49	18.65	0.49	1.09	0.46	0.38	9.25	1.16	0.44	0.45	14.57	18.65		
	VOC Potential Emissions (tons/yr)	2.76	3.33	2.91	1.99	4.19	7.82	3.24	3.74	4.22	4.47	3.75	2.02	2.55	0.00	2.14	81.67	2.15	4.76	2.03	1.66	40.49	5.09	1.94	1.99	63.80	81.67		
Hazardous Air Pollutant (HAP) Content	Weight % Benzene	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2.90E-04%	0.92%	0%	0%	0%	100%	100%		
	Weight % Biphenyl	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6.30E-04%	0%	0%	0%	0%	0%	6.3E-04%		
	Weight % Dichlorobenzene	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	100%	
	Weight % Ethanol	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	100%	
	Weight % Ethylbenzene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.07%	0.08%	0%	0%	0%	100%	100.00%	
	Weight % Fluorene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	8.60E-04%	0%	0%	4.20E-05%	0%	0%	8.6E-04%	
	Weight % Formaldehyde	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	100%	
	Weight % Glycol Ether	0%	100%	100%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	100%
	Weight % n-Hexane	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.82%	0%	0%	0%	100%	100%	
	Weight % Isopropyl benzene (Cumene)	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.01%	0%	0%	0%	100%	1.0E+00%	
	Weight % MeCl	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	100%
	Weight % Methanol	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	200%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	200%	
	Weight % MTBE	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	16.24%	0%	0%	0%	100%	100.0%	
	Weight % Napthalene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.26%	0%	0%	31%	0%	0%	31.0%	
	Weight % Phenanthrene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	8.80E-04%	0%	0%	8.60E-06%	0%	0%	8.8E-04%	
	Weight % Styrene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	100%	100%	
	Weight % Toluene	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0.18%	0.32%	0%	0%	0%	100%	100%	
Weight % Vinyl acetate	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	100%	100%		
Weight % Xylenes	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0.50%	0.32%	0%	0%	0%	100%	100%		



**Appendix A: Emissions Calculations  
Non-pressurized Rail Tank Car and Truck Tanker Cleaning Operations  
Liquid Heel Removal**

**Company Name:** United Transportation Group  
**Source Address:** 1150 East 145th Street, East Chicago, IN 46312  
**Operation Permit No.:** 089-37256-00469  
**Permit Reviewer:** Hannah L. Desrosiers

To calculate evaporative emissions from the draining of organic liquids from non-pressurized rail tank cars and truck tankers, emission factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids were used. The total potential emission of VOC and HAP is as follows:

**Maximum Rail Tank Car Throughput**

Emission Source	Single Wash Station Processing Time (hours/unit/station)*	Maximum Throughput for Single Wash Station (units/hour)	Total Number of Wash Stations	Maximum Throughput for all Wash Stations (units/hour)	Maximum Throughput for all Wash Stations (units/year)	Volume of Liquid Heel Drained from Each Tank** (gallons/unit)	Annual Amount of Liquid Heel Drained (kgal/year)
Non-pressurized Rail Tank Cars	3.0	0.33	1	0.33	2,920	100	292
Truck Tankers	1.0	1.0	2	2.00	17,520	75	1,314

**Uncontrolled/Unlimited Potential to Emit VOC and HAPs**

Emission Source	Emission Factor*** (lb/kgal of throughput)	Uncontrolled/Unlimited PTE of VOC (tons/year)	Uncontrolled/Unlimited PTE of HAP**** (tons/year)	Worst Case HAP****
Non-pressurized Rail Tank Cars	11.50	1.68	1.68	methanol
Truck Tankers	11.50	7.56	7.56	methanol

**Notes**

Max Annual Operating Hours (hours/year) = 8760

\*Process times based on worst case assumption that all rail tank cars and truck tankers have a liquid heel.

\*\* Volume of Liquid Heel Drained from Each Tank (gallons/car), estimated.

\*\*\*Emission Factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids (dated 6/08), Table 5.2-7 for splash filling of underground tank (stage I) used for filling drums.

\*\*\*\*As a worst case assumption, the VOC emitted is assumed to be HAP. All HAP assumed to be methanol, since methanol has the highest vapor pressure of all HAPs processed by the source.

**Methodology**

Maximum Throughput for Single Wash Station (units/hour) = 1 \ Single Wash Station Processing Time (hours/unit/station)

Maximum Throughput for all Wash Stations (units/hour) = [Maximum Throughput for Single Wash Station (units/hour)] \* [Total Number of Wash Stations]

Maximum Throughput for all Wash Stations (units/year) = [Maximum Throughput for all Wash Stations (units/hour)] \* [8760 hours/year]

Annual Amount of Liquid Heel Drained (kgal/yr) = [Volume of Liquid Heel Drained from Each Rail Tank (gallons/unit)] \* [Maximum Throughput for all Wash Stations (units/year)] \* [kgal/1000 gal]

Uncontrolled/Unlimited PTE (tons/yr) = [Annual Amount of Liquid Heel Drained (kgal/yr)] \* [Emission Factor (lb/kgal)] \* [ton/2000 lb]

**Abbreviations**

VOC = Volatile Organic Compounds

HAP = Hazardous Air Pollutant

PTE = Potential to Emit

**Appendix A: Emission Calculations  
Non-pressurized Rail Tank Car & Truck Tanker Cleaning Operations  
Dry Heel Removal**

**Company Name:** United Transportation Group  
**Source Address:** 1150 East 145th Street, East Chicago, IN 46312  
**Operation Permit No.:** 089-37256-00469  
**Permit Reviewer:** Hannah L. Desrosiers

Emission Source	Total Number of Wash Stations	Single Wash Station Processing Time (hours/unit/station)*	Cleaning Production Capacity (units cleaned/hr)	Material Removed** (tons/unit)	Emission Factor (lbs/ton) ***			Potential to Emit (lbs/hr)			Potential to Emit (tons/yr)		
					PM	PM10	PM2.5****	PM	PM10	PM2.5****	PM	PM10	PM2.5****
Non-pressurized Rail Tank Cars	1	3.0	0.33	0.25	0.30	0.07	0.07	0.03	0.01	0.01	0.11	0.03	0.03
Truck Tankers	2	1.0	2.00	0.25	0.30	0.072	0.072	0.15	0.04	0.04	0.66	0.16	0.16
<b>Totals</b>											<b>0.66</b>	<b>0.16</b>	<b>0.16</b>

**Notes**

Total emissions based on rated capacity at 8,760 hours/year.

\* Process times based on worst case assumption that all railcars and truck tankers have a dry heel.

The actual throughput (units/yr) of units containing a dry material heel provided by the source as 20 cars/yr. However, to form a conservative estimate, it is assumed that each unit processed through a cleaning station contains a dry material heel.

\*\* Material Removed (lbs/unit) provided by the source as 500 lbs/car.

Includes manual unloading of non-pressurized railcars and/or truck tankers, using a shovel into a drum or drums. Dry materials may include but are not limited to: rock, stone and other aggregates, coal, coke, metal and mineral ores, various granular products, such as sand, grains, woodchips, and plastic pellets, fertilizers (including potash), foodstuffs (i.e., flour, sugar), and salt.

\*\*\* There are no emission factors available for solid heel removal from non-pressurized railcars or truck tankers; therefore, particulate emission from unloading of solid residues were estimated using emission factors for fines screening at crushed stone processing operations (AP 42 Chapter 11.19.2, Table 11.19.2-2).

\*\*\*\* PM2.5 emissions assumed equal to PM10 emissions.

**Methodology**

Cleaning Throughput Capacity (units cleaned/hr) = [Total Number of Wash Stations / Single Wash Station Processing Time (hours/unit/station)]

Material Removed (tons/unit) = [Material Removed (lbs/unit) \* 1 ton/2000 lbs]

Potential to Emit PM/PM10/PM2.5 (lbs/hr) = [Cleaning Production Capacity (units cleaned/hr) \* Material Removed (tons/unit) \* Emission Factor (lbs/ton)]

Potential to Emit PM/PM10/PM2.5 (tons/yr) = [Potential to Emit PM/PM10/PM2.5 (lbs/hr) \* (8760 hrs/1 yr) \* (1 ton/2000 lbs)]

**326 IAC 6-3-2 Allowable PM Emission Rate**

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential particulate emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are specifically exempted from the requirements of 326 IAC 6-3.

**Appendix A: Emissions Calculations**  
**Process Emissions from the**  
**Pressurized Rail Tank Car Purging/Degassing Operation**  
**Natural Gas-Assisted Enclosed Flare**

**Company Name:** United Transportation Group  
**Address City IN Zip:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit Number:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

**Volatile Organic Compound (VOC) Emissions**

VOC emissions from the pressurized rail tank car cleaning operation are controlled by natural gas-assisted enclosed flare.

Worst-case emissions rate*	0.51	pounds VOC captured/combusted per hour, controlled by flare
Flare Destruction Efficiency	98%	(assumed)
Potential to Emit Before Flare (lbs/hr)	25.50	pounds VOC captured per hour, uncontrolled
Potential to Emit Before Flare (tons/yr)	111.69	tons VOC captured per year, uncontrolled

Notes

\* Source-specific emission rate established during most recent valid (2012) stack test. The testing was conducted on Rail Tank Cars being decontaminated after transporting polypropylene. An email, dated 12/10/2012, associated with the test report indicates an inbound gas flow rate of 44,000 SCFH. As many as three (3) pressurized cars can be hooked up to a manifold and exhausted to the flare at any given time.

The pressurized rail tank cars processed by United Transportation Group contain substances that are each not considered a "hazardous waste" as defined in 40 CFR 63.1201 and 40 CFR 261.3.

Pressurized rail tank cars may contain any of the following compressed gasses:

Butane	1,2-Butadiene	Isopentane	Polypropylene	Stenched Propane
Butylene Mix	Ethane	Methylcyclopropane	Propane	
1-Butene	Isobutane	NeoPentane	Propylene	
2-Butene	Isobutylene	n-Pentane	Refinery Grade Propane	

Abbreviations

VOC - Volatile Organic Compounds  
HAPs - Hazardous Air Pollutants

Methodology

Adjusted emission rate (lbs/hr) = [Actual emission rate (lbs/hr) + (Actual emission rate (lbs/hr) \* 40%)]

Potential to Emit Before Flare (lbs/hr) = [Adjusted emission rate (lbs/hr) / (1 - Flare Destruction Efficiency (%))]

Potential to Emit Before Flare (tons/yr) = [Potential to Emit Before Flare (lbs/hr) \* 8760 hrs/yr \* 1 ton/2000 lbs]

**Particulate (PM/PM10/PM2.5), NOx, and CO Emissions**

Particulate (PM/PM10/PM2.5), NOx, and CO emitted by combustion in the flare are estimated as follows:

VOC Captured/Combusted	111.69	tons/year	Atmospheric Pressure	14.70	psia
Universal Gas Constant	10.73	ft <sup>3</sup> psia/°R lb.mol	Molecular Weight of Polypropylene	42.0804	lb/lbmol
Gas/Vapor Temperature	72.0	°F	Gas/Vapor Temperature	532.7	R

VOC Captured/Combusted 2.1 MMBtu/year

Criteria Pollutants	Pollutant		
	PM/PM10/PM2.5*	NOx**	CO**
Emission Factor	177.0 (ug/L)	0.068 (lbs/MMBtu)	0.31 (lbs/MMBtu)
Potential to Emit (PTE) (tons/yr)	0.011	7.02E-05	3.20E-04

Notes

\*Emission Factor for PM is from AP-42, Chapter 13.5 - Industrial Flares -Table 13.5-1 - Soot for average smoking flares (AP-42, 4/15). PM10 and PM2.5 emissions are assumed equal to PM emissions.

\*\*Emission Factors for NOx and CO are from AP-42, Chapter 13.5 - Industrial Flares, Tables 13.5-1 and 13.5-2 (AP-42, 4/15)

Methodology

VOC Captured/Combusted (MMBtu/year) = VOC Captured/Combusted (tons/year) \*2000 \* Universal Gas Constant (psia ft<sup>3</sup>/lbmol R) \* (Gas/Vapor Temperature (R) / (Atmospheric Pressure (psia) \* Molecular Weight of Polypropylene (lb/lbmol) \* 1000000))

PTE of PM/PM10/PM2.5 (tons/yr) = [VOC Captured/Combusted (MMBtu/year)] \* [1000000 ft<sup>3</sup>/MMcf] \* [28.317 L/ft<sup>3</sup>] \* [Emission Factor (ug/L)] \* [g/1000000 ug] \* [lbs/453.6 g] \* [ton/2000 lbs]

PTE of NOx/CO (tons/yr) = [Maximum Heat Input (MMBtu/year)] \* [Emission Factor (lbs/MMBtu)] \* [ton/2000 lbs]

Abbreviations

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particulate Matter (<2.5 um)  
NOx = Nitrous Oxides  
CO = Carbon Monoxide

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Pressurized Rail Tank Car Purging/Degassing Operation  
Natural Gas-Assisted Enclosed Flare**

**Company Name:** United Transportation Group  
**Source Address:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit Number:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.102	1020	0.9

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	8.32E-04	3.33E-03	3.33E-03	2.63E-04	0.04	2.41E-03	0.04

\*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/1,020 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants (HAPs)**

Emission Factor in lb/MMcf	HAPs - Organics					Total 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	9.2E-07	5.3E-07	3.3E-05	7.88E-04	1.5E-06	<b>8.24E-04</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total 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	2.2E-07	4.8E-07	6.1E-07	1.7E-07	9.2E-07	<b>2.4E-06</b>

	<b>Total HAPs</b>	<b>8.27E-04</b>	
	<b>Worst HAP</b>	<b>7.88E-04</b>	<b>(hexane)</b>

Methodology is the same as above.  
 The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
Liquid Commodity Transfer Facility  
Transloading Operation**

**Company Name:** United Transportation Group  
**Source Address:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit Number:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

To calculate evaporative emissions from transloading liquids from rail tank car or truck tanker to rail tank car or truck tanker, it was assumed as a worst case scenario that gasoline (for VOC) and methylene chloride (MeCl) (for HAP) were transloaded. Emission factors for filling storage tank (submerged filling) from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids (dated 6/08) were used.

Maximum Throughput <sup>(1)</sup> =	50,000	gal/day
Maximum Annual Throughput =	18,250,000	gal/yr
Maximum Annual Throughput =	18,250	kgal/yr

**Volatile Organic Compounds (VOCs)**

Emission Source	Emission Factor <sup>(2)</sup> (lb/kgal of throughput)	PTE of VOC (tons/yr) <sup>(3)</sup>
Filling storage tank (submerged filling) with gasoline	6.15	56.12
Filling storage tank (submerged filling) with MeCl	6.68	60.98
<b>Worst Case PTE:</b>		<b>60.98</b>

MeCl = Methylene Chloride

**METHODOLOGY**

- (1) The maximum throughput was provided by the source.  
Maximum Throughput (gal/day) is based on a worst-case assumption of transloading two (2) 3,209 cubic foot non-pressurized rail tank car of liquid per day. Cubic foot (ft<sup>3</sup>) capacity has been converted to gallons.  
Maximum Throughput (gal/day) = [Max capacity of non-pressurized rail tank car (ft<sup>3</sup>) \* (1 ft<sup>3</sup>/7.48 gallons)]
- (2) Emission Factor for filling storage tank (submerged filling), calculated using equation (1), page 5.2-4.

$$LL = 12.46 \left( \frac{SPM}{T} \right)$$

Where:

- LL = Loading Loss, pounds per 1000 gallons (lbs/kgal) of liquid loaded (throughput)  
S = Saturation factor (AP 42, Table 5.2-1. Saturation (S) Factors for Calculating Petroleum Liquid Loading Losses)  
P = True vapor pressure of liquid loaded, pounds per square inch absolute (psia)  
M = Molecular weight of vapors, pounds per pound-mole (lb/lb-mole)  
This data is from AP-42, Table 7.1-2 for gasoline, and EPA TANKS for MeCl. MeCl has a true vapor pressure of 5.0601 psia ; temperature of 55.48 °F, this has been extrapolated to obtain the pressure (psia) at 60 °F.  
T = Temperature of bulk liquid loaded °R (°F +460)

	Gasoline	MeCl	
S =	0.60	0.60	(from AP 42, Table 5.2-1 for submerged loading: dedicated normal service)
P =	6.90	5.47	psia (at 60 °F, ~520 °R)
M =	62.0	84.9	lb/lbmol
T =	520	520	°R
LL =	6.15	6.68	lb/kgal

- (3) PTE of VOC (tons/yr) = [Maximum Throughput (kgal/yr)] \* [Emission Factor (lb/kgal)] \* [ton/2000 lb]

**Hazardous Air Pollutants (HAPs) for Gasoline**

Volatile Organic HAP	CAS#	Hazardous Air Pollutant (HAP) Content (vapor mass fraction) <sup>(4)</sup>	PTE of HAP (tons/yr) <sup>(5)</sup>
Benzene	71-43-2	0.37%	0.21
n-Hexane	110-54-3	0.34%	0.19
Toluene	108-88-3	0.40%	0.22
m-Xylenes	108-38-3	0.11%	0.06
Total PTE of HAPs (tons/yr) <sup>(6)</sup>			0.68
PTE of Worst Single HAP (tons/yr)			0.22 (Toluene)

**Hazardous Air Pollutants (HAPs) for MeCl**

Volatile Organic HAP	CAS#	Hazardous Air Pollutant (HAP) Content (vapor mass fraction) <sup>(4)</sup>	PTE of HAP (tons/yr) <sup>(5)</sup>
Methylene Chloride (MeCl)	75-09-2	100%	60.98
Total PTE of HAPs (tons/yr) <sup>(6)</sup>			60.98
PTE of Worst Single HAP (tons/yr)			60.98 (MeCl)

<b>Worst Case PTE of HAPs (tons/yr)</b>	<b>60.98</b>
<b>PTE of Worst Single HAP (tons/yr)</b>	<b>60.98 (MeCl)</b>

- (4) Source: US EPA TANKS Version 4.09 program  
(5) PTE of HAP (tons/yr) = [Hazardous Air Pollutant (HAP) Content (vapor mass fraction)] \* [PTE of VOC (tons/yr)]  
(6) PTE of Total HAPs (tons/yr) = SUM[PTE of HAP of each single HAP (tons/yr)]

**Abbreviations**

HAP = Hazardous Air Pollutant  
VOC = Volatile Organic Compounds  
PTE = Potential to Emit

**Appendix A: Emission Calculations**  
**Particulate (PM/PM10/PM2.5) Emissions from**  
**Abrasive Blasting - Confined**  
**Portable Shotblasting Unit (SB1)**

**Company Name:** United Transportation Group  
**Source Address:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit Number:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	<b>0.010</b>	<b>0.70</b>
Steel Shot	0.004	0.86
Other	0.010	

**Table 2 - Process Rate for Abrasive Blasting**

# of railcar cleaning bays	1.0	cleaning bays
Process Rate <sup>(1)</sup>	8.0	hours/railcar/cleaning bay
Maximum Throughput <sup>(1)</sup>	0.125	rail tank cars blasted/hour
Maximum Throughput <sup>(1)</sup>	1,095	rail tank cars blasted/year
Maximum Annual Hours of Blasting <sup>(1)</sup>	4,380	hours/yr

Potential to Emit Before Control			
FR = Flow rate of actual abrasive (lb/hr) =	1,000	lb/hr (per nozzle)	
w = fraction of time of wet blasting =	0	%	
N = number of nozzles =	1		
EF = PM emission factor for actual abrasive from Table 1 =	0.010	lb PM/ lb abrasive	
PM10 emission factor ratio for actual abrasive from Table 1 =	0.70	lb PM10 / lb PM	
<b>Potential to Emit (uncontrolled) =</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>
=	10.00	7.00	7.00
=	240.00	168.00	168.00
=	<b>21.90</b>	<b>15.33</b>	<b>15.33</b>
			lb/hr
			lb/day
			ton/yr
<b>Limited hours of operation =</b>	<b>2,675</b>	hrs/yr	
<b>Limited Potential to Emit (uncontrolled) =</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>
=	13.38	9.36	9.36
			ton/yr

**NOTES**

PM2.5 emissions assumed equal to PM10 emissions.

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

(1) Process includes blasting interior and/or exterior surfaces of non-pressurized rail tank cars.

Based on information provided by the source, the process of blasting the inside one railcar and cleaning out the spent media takes 8 hours.

To form a conservative estimate of emissions, it is assumed that the blasting of 1 car is comprised of 4 hours blasting and 4 hours cleaning out the spent media.

Therefore, blasting only occurs 50% of the time and the maximum annual hours of blasting would be (50%) \* (8760 hours/year) = 4380 hours/year.

**METHODOLOGY**

Potential to Emit (uncontrolled) (lbs/hr) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (uncontrolled) (tons/year) = [Potential to Emit (uncontrolled) (lbs/hour)] x [Maximum Annual Hours of Blasting hours/year] x [ton/2000 lbs]

**Appendix A: Emission Calculations  
Portable Shotblasting Unit (SB1)  
Spent Media Clean Out**

**Company Name:** United Transportation Group  
**Source Address:** 1150 East 145th Street, East Chicago, IN 46312  
**Operation Permit No.:** 089-37256-00469  
**Permit Reviewer:** Hannah L. Desrosiers

Emission Source	Number of Blasting Stations	Flow rate of abrasive** (lb/hr)	Flow rate of abrasive (tons/hr)	Maximum Annual Hours of Blasting (hours/year)*	Emission Factor (lbs/ton) ***			Potential to Emit (lbs/hr)			Potential to Emit (tons/yr)		
					PM	PM10	PM2.5****	PM	PM10	PM2.5****	PM	PM10	PM2.5****
Non-pressurized Rail Tank Cars	1	1,000	0.50	4,380	0.30	0.072	0.072	0.15	0.04	0.04	0.33	0.08	0.08
<b>Totals</b>											<b>0.33</b>	<b>0.08</b>	<b>0.08</b>

**Notes**

Total emissions based on rated capacity at 8,760 hours/year.

\* Process includes blasting interior and/or exterior surfaces of non-pressurized rail tank cars and manual unloading of dry materials using a shovel into a drum or drums. Dry materials being removed from rail tank cars include but are not limited to: spent blasting media (grit) along with some rust, pieces of rail tank car liners, and/or other undesirable materials. To form a conservative estimate, it is assumed that each unit processed through a rail tank car cleaning station also is being shotblasted. Based on information provided by the source, the process of blasting the inside one railcar and cleaning out the spent media takes 8 hours. To form a conservative estimate of emissions, it is assumed that the blasting of 1 car is comprised of 4 hours blasting and 4 hours cleaning out the spent media. Therefore, blasting only occurs 50% of the time and the maximum annual hours of blasting would be (50%) \* (8760 hours/year) = 4380 hours/year.

\*\*To form a conservative estimate, it is assumed that all the abrasive used to clean rail tank cars breaks down to become particulate emissions. In actuality, this is not the case. However, doing so accounts for the rust, railcar liner bits and pieces, and/or other substances being removed from the rail tank cars during the shotblasting process.

\*\*\* There are no emission factors available for removal of grit, rust, railcar liner bits and pieces, and other materials, from non-pressurized rail tank cars; therefore, particulate emissions from unloading these solid residues were estimated using emission factors for fines screening at crushed stone processing operations (AP 42 Chapter 11.19.2, Table 11.19.2-2).

\*\*\*\* PM2.5 emissions assumed equal to PM10 emissions.

**Methodology**

Flow rate of abrasive (tons/hr) = [Flow rate of abrasive (lbs/hr) \* 1 ton/2000 lbs]

Potential to Emit PM/PM10/PM2.5 (lbs/hr) = [Flow rate of abrasive (tons/hr) \* Emission Factor (lbs/ton)]

Potential to Emit PM/PM10/PM2.5 (tons/yr) = [Potential to Emit PM/PM10/PM2.5 (lbs/hr) \* (Maximum Annual Hours of Blasting hours/year) \* (1 ton/2000 lbs)]

**326 IAC 6-3-2 Allowable PM Emission Rate**

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential particulate emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are specifically exempted from the requirements of 326 IAC 6-3.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Boiler B1**

**Company Name:** United Transportation Group  
**Address City IN Zip:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit Number:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

Heat Input Capacity* (MMBtu/hr)	HHV mmBtu mmscf	Potential Throughput MMCF/yr
5.02	1020	43.11

Emission Factor in lb/MMCF	Pollutant						
	PM**	PM10**	direct PM2.5**	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 ***see below	5.5	84.0
Potential Emission in tons/yr	0.041	0.164	0.164	0.013	2.156	0.119	1.811

\*The boiler is rated at 150 hp. A thermal efficiency of 80% was used to convert from horsepower (hp) output to MMBtu/hr input.

\*\*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

#### 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/1,020 MMBtu

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

#### Hazardous Air Pollutants (HAPs)

	HAPs - Organics					Total Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	4.5E-05	2.6E-05	1.6E-03	0.039	7.3E-05	<b>0.041</b>

	HAPs - Metals					Total Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.1E-05	2.4E-05	3.0E-05	8.2E-06	4.5E-05	<b>1.2E-04</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

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

<b>Total HAPs (tons/yr):</b>	<b>0.041</b>
<b>Worst HAP (tons/yr):</b>	<b>0.039 (hexane)</b>

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Insignificant HVAC Units & Heaters**

Emission Unit	Heat Input Capacity (MMBtu/hr)
HVAC	0.050
Heater	0.250
<b>Total:</b>	<b>1.25</b>

HHV mmBtu mmscf
1020

Potential Throughput MMCF/yr
10.74

**Company Name:** United Transportation Group  
**Address City IN Zip:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit Number:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

Emission Factor in lb/MMCF	Pollutant						
	PM**	PM10**	direct PM2.5**	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 ***see below	5.5	84.0
Potential Emission in tons/yr	0.01	0.04	0.04	3.22E-03	0.54	0.03	0.45

\*80% thermal efficiency used in the conversion of hp output to MMBtu/hr input

\*\*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/1,020 MMBtu

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

#### Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.1E-05	6.4E-06	4.0E-04	0.010	1.8E-05	<b>0.010</b>

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.7E-06	5.9E-06	7.5E-06	2.0E-06	1.1E-05	<b>2.9E-05</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

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

<b>Total HAPs (tons/yr):</b>	<b>0.010</b>
<b>Worst HAP (tons/yr):</b>	<b>0.010 (hexane)</b>

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

**Company Name:** United Transportation Group  
**Address City IN Zip:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit Number:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	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)
Truck Tankers - Enter Empty	48.0	1.0	48.0	16.0	768	210	0.040	1.9	697
Truck Tankers - Leave Empty	48.0	1.0	48.0	16.0	768	210	0.040	1.9	697
Heavy Duty Vehicles - Enter Full	2.0	1.0	2.0	17.0	34	650	0.123	0.2	90
Heavy Duty Vehicles - Leave Empty	2.0	1.0	2.0	16.0	32	650	0.123	0.2	90
Light Duty Vehicles - Enter with driver	24.0	1.0	24.0	2.4	58	215	0.041	1.0	357
Light Duty Vehicles - Leave with driver	24.0	1.0	24.0	2.4	58	215	0.041	1.0	357
<b>Totals</b>			<b>148.0</b>		<b>1,717</b>			<b>6.3</b>	<b>2,287</b>

Average Vehicle Weight Per Trip = 

11.6	tons/trip
------	-----------

  
Average Miles Per Trip = 

0.04	miles/trip
------	------------

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	11.6	11.6	11.6	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities (Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p = 

125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
365	days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	1.060	0.212	0.0520	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.969	0.194	0.0476	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)
Truck Tankers - Enter Empty	0.37	0.07	0.02	0.34	0.07	0.02
Truck Tankers - Leave Empty	0.37	0.07	0.02	0.34	0.07	0.02
Heavy Duty Vehicles - Enter Full	0.05	0.01	0.00	0.04	0.01	0.00
Heavy Duty Vehicles - Leave Empty	0.05	0.01	0.00	0.04	0.01	0.00
Light Duty Vehicles - Enter with driver	0.19	0.04	0.01	0.17	0.03	0.01
Light Duty Vehicles - Leave with driver	0.19	0.04	0.01	0.17	0.03	0.01
<b>Totals</b>	<b>1.21</b>	<b>0.24</b>	<b>0.06</b>	<b>1.11</b>	<b>0.22</b>	<b>0.05</b>

**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)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

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

**Notes**

It takes 1 hr to clean one (1) truck tanker, and United Transportation Group (UTG) has two (2) service bay to truck tankers. Therefore, the maximum throughput is 2 truck tankers per hour, or 48 truck tankers per day.  
Heavy Duty Vehicles include: freight trucks (6-axes or smaller), and front-end loaders.  
Light Duty Vehicles include: cargo vans, pick-up trucks, sport utility vehicles, and passenger cars.

**Appendix A: Emissions Calculations**  
**Non-pressurized Rail Tank Car and Truck Tanker**  
**Cleaning Operations - Commodities List**

**Company Name:** United Transportation Group  
**Address City IN Zip:** 1150 East 145th Street, East Chicago, IN 46312  
**Permit No.:** 089-37256-00469  
**Reviewer:** Hannah L. Desrosiers

Non-pressurized rail tank cars, pressurized rail tank cars, and truck tankers have contained substances including but not limited to the following:

1-Butene	Flexisol DBE Esters	Propylene
2-Butene	Flour	Polypropylene
1,2-Butadiene	Fuel Grade Ethanol	Propane
22 Degree Baume Muriatic	Gasoline	Propylene
2A Basin Sludge	Gibson Heavy Crude	Prowax 515
Aatrex 4L Herbicide	Halex GT Herbicide	Prowax 563
Access Western Blend	Heavy Crude Oil	PUMA HF
Acetone	Heavy Fuel Oil	Rain Water
Acid Oil	Heavy Oil Sweet	Redicote E-11-E
Acidulated Glycerine	Heavy Vacuum Gas Oil	Redicote E-9
Ammonium Sulfide Solution	Hi Tec 362 C Performance	Refinery Grade Propane
Amphosol HCA	High Sweet Crude Oil	Refinery Grade Propylene
Anhydrous Ammonia	HLU NJHT Diesel	Sasolab C11H Detergent
APS 600	Hydrocal 38	SDS Fuel Grade Ethanol
Armeen CD	Hydrofluoric Acid 30-55%	S-Metolachlor Technical
Armeen TMD	Hydrolene H90-T	SN500
Asphalt	Intermediate Catalytic Cracked Distillate	Soapstock
Asphalt Flux	Isobutane	Sodium Bicarbonate
Benzene	Isobutylene	Sodium Hydroxide
Beta Picoline	Isopentane	Sodium Silicate
Bicep II Magnum	Kerosene Type Aviation Turbine	Soy Lechtin
Biodiesel	Lignosulphonate Solution	Starch
Bio-Soft S-101	Linpar 1416-V Normal Paraffin	Statoil Cheecham
Bio-Terge AS40	Lube Oil	Steepwater
Bitume Petroleum Pitch	Magnesium Chloride Soution	Stenched Propane
Bitumen	Magnesium Sulfate	Steol CS-230
Bravo ZN Fungicide	Maleic Anhydride	Stepan Biodiesel SB-W
Butane	Metam Sodium	Stepan C-25
Butane Gas	Methanol	Stepan C-42
Butylene Mix	Methyl Carbamate	Stepan C-65
Calcium Carbide	Methylcyclopropane	Stepan C-66
Calcium Chloride	Methyl Esters C-66	Stepanate SXS
Canola Oil	Middlings	Stepanol AXS
Carbinol - Methyl Alcohol	Mineral Spirits, Non Exempt	Stepanol PS2352
Chlorine	Motor Oil	Sulfidic Caustic Solution
Condensate	Natural Gasoline	Sulfolane Wash Water
Corn Oil	Ninate 401A	Sulphur Dioxide
Corn Syrup	NeoPentane	Super Sul Cam AS
Crude Petroleum Oil	n-Pentane	Sweet Crude Oil
Crude Oil	No. 1 Diesel Fuel	Synthemul HS-200
Crude Oil, Sour	Nufarm Credit 360 Liquid Herbicide	Tallow
Crude Oil, Sweet	On-Spec Used Oil	Touchdown Total Herbicide
Denatured Anhydrous Ethyl Alcohol	Petroleum Crude Oil	Turkey Water (Fatty Acid Water)
Denatured Ethanol	Petroleum Crude Oil Sweet	Urea Ammonium Nitrate
Deodarizer Distillate	Petroleum Lube Oil	US High Sweet Clearbrook Crude Oil
Diesel Fuel	Petroleum Residual Fuel Oil	Used Oil
Distillate	Phthalic Anhydride	Vycerin GL88 Glycerine
Echo Pipeline Heavy Oil	Plurocal 4850 Polyol	Waste Flammable Liquids
Edible Shortening & Oil	Plurocal-1365 Polyol	Water & Citric Acid Solution
Ethane	Polyol Distillate C	White Phosphoric Acid
Ethanol	Propane	Whole Wheat Flour
		Xylene



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

August 19, 2016

Mr. Michael V. Pellin  
United Transportation Group, Inc.  
1150 East 145<sup>th</sup> Street  
East Chicago, IN 46312

Re: Public Notice  
United Transportation Group, Inc.  
Permit Level: Federally Enforceable State  
Operating Permit (FESOP) Renewal  
with New Source Review  
Permit Number: 089-37256-00469

Dear Mr. Pellin:

Enclosed is a copy of your draft Federally Enforceable State Operating Permit (FESOP) Renewal with New Source Review, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Post Tribune in Merrillville, Indiana and The Times in Munster, Indiana publish the abbreviated version of the public notice no later than August 23, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the East Chicago Public Library, 2401 East Columbus Drive in East Chicago, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Hannah L. Desrosiers, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-9327 or dial (317) 233-9327.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

August 18, 2016

The Post Tribune  
1433 E. 83<sup>rd</sup> Avenue  
Merrillville, IN 46410

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for United Transportation Group, Inc., Lake County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 23, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permit Branch  
Office of Air Quality

Permit Level: Federally Enforceable State Operating Permit (FESOP) Renewal  
With a New Source Review

Permit Number: 089-37256-00469

Enclosure  
PN Newspaper.dot 8/27/2015



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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

August 18, 2016

The Times  
601 West 45<sup>th</sup> Avenue  
Munster, IN 46321

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for United Transportation Group, Inc., Lake County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 23, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permit Branch  
Office of Air Quality

Permit Level: Federally Enforceable State Operating Permit (FESOP) Renewal  
With a New Source Review

Permit Number: 089-37256-00469

Enclosure  
PN Newspaper.dot 8/27/2015



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

August 19, 2016

To: East Chicago Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: United Transportation Group, Inc.**  
**Permit Number: 089-37256-00469**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 2/16/2016



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**August 19, 2016**  
**United Transportation Group, Inc.**  
**089-37256-00469**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV). If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	VHAUN 8/19/2016 United Transportation Group, Inc. 089-37256-00469			DRAFT	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:  <b>CERTIFICATE OF MAILING ONLY</b>		

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		Michael V Pellin United Transportation Group, Inc. 1150 E 145th St East Chicago IN 46312 (Source CAATS)										
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		East Chicago Public Library 2401 E Columbus Dr East Chicago IN 46312-2998 (Library)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
6		Lowell Town Council and Town Manager PO Box 157, 501 East Main Street Lowell IN 46356 (Local Official)										
7		Shawn Sobocinski 1814 Laporte Street Portage IN 46368-1217 (Affected Party)										
8		Mr. Dennis Hahney Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 (Affected Party)										
9		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
10		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
11		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
12		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
13		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
14		Mr. Paul Dubenetzky Cornerstone Environmental 880 Lennox Ct Zionsville IN 46077 (Consultant)										
15		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (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.
<b>15</b>			

# Mail Code 61-53

IDEM Staff	VHAUN 8/19/2016 United Transportation Group, Inc. 089-37256-00469		DRAFT	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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
2		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
3		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
4		Ryan Dave 939 Cornwallis Munster IN 46321 (Affected Party)										
5		Mark Coleman PO Box 85 Beverly Shores IN 46301-0085 (Affected Party)										
6												
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13												
14												
15												

Total number of pieces Listed by Sender  <b>5</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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