

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION

Ashland Chemical Company
8315 E. 33rd Street
Indianapolis, Indiana 46226

(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.

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 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.:F097-5455-00186	
Issued by: Robert F. Holm, Ph.D., Administrator ERMD	Issuance Date:

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	4
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	5
A.3	Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]	5
A.4	FESOP Permit Applicability [326 IAC 2-8-2]	5
A.5	Prior Permit Conditions Superseded [326 IAC 2]	5
SECTION B	GENERAL CONDITIONS	7
B.1	Permit No Defense [326 IAC 2-1-10] [IC 13]	7
B.2	Definitions [326 IAC 2-8-1]	7
B.3	Permit Term [326 IAC 2-8-4(2)]	7
B.4	Enforceability [326 IAC 2-8-6]	7
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	7
B.6	Severability [326 IAC 2-8-4(4)]	7
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	7
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	7
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	8
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	8
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]	8
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	8
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]	9
B.14	Emergency Provisions [326 IAC 2-8-12]	10
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	12
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	12
B.17	Permit Renewal [326 IAC 2-8-3(h)]	12
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	13
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]	14
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	14
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]	14
B.22	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]	14
B.23	Operational Flexibility [326 IAC 2-8-15]	15
B.24	Construction Permit Requirement [326 IAC 2]	16
B.25	Inspection and Entry [326 IAC 2-8-5(a)(2)]	16
B.26	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]	16
B.27	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	17
SECTION C	SOURCE OPERATION CONDITIONS	18
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8]	18
C.2	Opacity [326 IAC 5-1]	18
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	18
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	18
C.5	Fugitive Dust Emissions [326 IAC 6-4]	18
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	19
C.7	Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]	19
	Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-2.1]	19

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]	19
C.10 Monitoring Methods [326 IAC 3]	20
C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]	20
Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]	
C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]	21
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	21
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	
C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]	22
C.15 Monitoring Data Availability	22
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]	23
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]	24
Stratospheric Ozone Protection	
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1	25
SECTION D.1 FACILITY OPERATION CONDITIONS	
Packaging and Distribution	26
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4(1)]	26
D.1.2 Hazardous Air Pollutants (HAP) [326 IAC 2-8-4(1)]	26
D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	27
Compliance Determination Requirements	
D.1.4 Compliance Determination for HAPs and VOCs	27
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]	
D.1.5 Record Keeping Requirements	27
D.1.6 Reporting Requirements	27
SECTION D.2 FACILITY OPERATION CONDITIONS	
Insignificant Emitting Activities - 2.1 mmBtu per hour Boiler	28
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.2.1 Particulate Emissions Limit [326 IAC 6-2-2]	28
Compliance Determination Requirements	
D.2.2 Stack Testing Requirements [326 IAC 2-8-5(1)]	28
Certification Form	29
Emergency/Deviation Form	30
Quarterly Report Form for VOC Emissions	32
Quarterly Report Form for Individual HAP Emissions	33
Quarterly Report Form for Combined HAP Emissions	34
Quarterly Deviation Report Form	35

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Environmental Resources Management Division (ERMD), and presented in the permit application.

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

The Permittee owns and operates a stationary bulk chemical packaging and distribution operation.

Responsible Official: Mr. Michael L. Rademacher
Source Address: 8315 E. 33rd Street, Indianapolis Indiana 46226
Mailing Address: 5200 Blazer Parkway, DA-4, Dublin, Ohio 43017
SIC Code: 5169
County Location: Marion
County Status: Nonattainment for TSP
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD or Emission Offset Rules

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. Tank 1, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- b. Tank 2, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- c. Tank 3, fixed roof tank with a storage capacity of 14,100 gallons, constructed in 1965.
- d. Tank 4, fixed roof tank with a storage capacity of 15,060 gallons, constructed in 1965.
- e. Tank 5, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- f. Tank 6, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- g. Tank 7, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- h. Tank 8, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- i. Tank 9, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- j. Tank 10, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- k. Tank 11, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- l. Tank 12, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- m. Tank 13, fixed roof blending tank with a storage capacity of 8,239 gallons, constructed in 1965.
- n. Tank 14, fixed roof tank with a storage capacity of 10,135 gallons, constructed in 1991.
- o. Tank 15, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1990.
- p. Tank 16, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- q. Tank 17, fixed roof tank with a storage capacity of 6,806 gallons, constructed in 1965.
- r. Tank 18, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- s. Tank 19, fixed roof tank with a storage capacity of 12,307 gallons, constructed in 1965.
- t. Tank 20, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- u. Tank 21, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- v. Tank 22, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- w. Tank 23, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- x. Tank 24, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- y. Tank 25, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- z. Tank 26, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.

- aa. Tank 27, fixed roof tank with a storage capacity of 9,651 gallons, constructed in 1965.

- bb. Tank 28, fixed roof tank with a storage capacity of 9,913 gallons, constructed in 1965.
- cc. Tank 29, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- dd. Tank 30, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- ee. Tank 31, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- ff. Tank 36, fixed roof tank with a storage capacity of 8,097 gallons, constructed in 1986.
- gg. Three (3) railcar unloading stations with pipes which lead underground to two risers at the truck unloading rack. The pipes from two of the rail car unloading stations merge underground before rising at the truck load out station. At the truck loading rack there are two pumps and headers which lead to the tank farm. The maximum combined pumping rate is approximately 30,000 gallons per hour. This facility was constructed in 1965.
- hh. One (1) Truck unloading and loading rack has room for two trucks and has two pumps with headers which lead to the tank farm. The maximum combined pumping rate is 30,000 gallons per hour. This facility was constructed in 1965.
- ii. Container Filling Station

A.3 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, as defined in 326 IAC 2-7-1(21):

- a) Natural Gas-fired combustion sources with heat input less than ten million (10,000,000) Btu per hour.
- b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- c) Application of oils, greases, lubricants or other nonvolatile materials applied as a temporary protective coating.
- d) Cleaners and solvents characterized as follows:
 - i) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psia measured at 38 degrees C (100 °F) or:
 - ii) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psia measured at 20 degrees C (68 °F) .the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- e) Paved and unpaved roads and parking lots with public access.
- f) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- g) On-site fire and emergency response training approved by the department.
- h) Rail car unloading station dedicated for the unloading of aircraft de-icing fluid. The aircraft de-icing fluid is made up of an aqueous solution of potassium acetate. The potential emissions of VOC from this facility are negligible because the material transferred is an aqueous salt solution.

A.4 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 Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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.

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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.6 Severability [326 IAC 2-8-4(4)]

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section

2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, and ERMD along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM and ERMD).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and ERMD 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.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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. The certification shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
 - (1) The 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, IDEM, OAM, and ERMD may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 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 prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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 that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (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 describes 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, OAM and ERMD, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

ERMD

Telephone No.: 317-327-2234

Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue

Indianapolis, Indiana 46221

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and ERMD, 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, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance 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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or their substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-8-12 satisfies the requirement of this subsection

B.16 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 FESOP 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and ERMD 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, OAM and ERMD, 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, OAM and ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and ERMD and shall include, at minimum, 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(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM and ERMD upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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, OAM and ERMD 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 in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM and ERMD, consistent with the procedures specified under 326 IAC 2-8-10(b).

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

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-8-11(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, and ERMD takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at

326 IAC 2-7-1(36))without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Environmental Resources Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

(b) For each such change, the required written notification shall include the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in 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(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and ERMD, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions 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 from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day 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 three hundred sixty-five (365) consecutive day 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 three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21).

(c) 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(Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would

violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation, as described in Section D of this permit.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

C.8 Performance Testing [326 IAC 3-2.1]

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days before the intended test date.

(b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM and ERMD, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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 insure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) asbestos removal or demolition start date;
 - (B) removal or demolition contractor; or
 - (3) 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Asbestos
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) **Submit:**
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall

notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The annual 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, OAM, and ERMD on or before the date it is due.

C.15 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations

and sampling should be taken with a record made of the nature of the abnormality.

- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and ERMD representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall

briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quality Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (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, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the

required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Bulk Chemical Packaging and Storage Operation which includes the following equipment:

- a. Tank 1, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- b. Tank 2, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- c. Tank 3, fixed roof tank with a storage capacity of 14,100 gallons, constructed in 1965.
- d. Tank 4, fixed roof tank with a storage capacity of 15,060 gallons, constructed in 1965.
- e. Tank 5, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- f. Tank 6, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- g. Tank 7, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- h. Tank 8, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- i. Tank 9, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- j. Tank 10, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- k. Tank 11, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- l. Tank 12, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- m. Tank 13, fixed roof blending tank with a storage capacity of 8,239 gallons, constructed in 1965.
- n. Tank 14, fixed roof tank with a storage capacity of 10,135 gallons, constructed in 1991.
- o. Tank 15, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1990.
- p. Tank 16, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- q. Tank 17, fixed roof tank with a storage capacity of 6,806 gallons, constructed in 1965.
- r. Tank 18, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- s. Tank 19, fixed roof tank with a storage capacity of 12,307 gallons, constructed in 1965.
- t. Tank 20, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- u. Tank 21, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- v. Tank 22, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- w. Tank 23, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- x. Tank 24, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- y. Tank 25, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- z. Tank 26, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- aa. Tank 27, fixed roof tank with a storage capacity of 9,651 gallons, constructed in 1965.
- bb. Tank 28, fixed roof tank with a storage capacity of 9,913 gallons, constructed in 1965.
- cc. Tank 29, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- dd. Tank 30, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- ee. Tank 31, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- ff. Tank 36, fixed roof tank with a storage capacity of 8,097 gallons, constructed in 1986.
- gg. Three (3) railcar unloading stations with pipes which lead underground to two risers at the truck unloading rack. The pipes from two of the rail car unloading stations merge underground before rising at the truck load out station. At the truck loading rack there are two pumps and headers which lead to the tank farm. The maximum combined pumping rate is approximately 30,000 gallons per hour. This facility was constructed in 1965.
- hh. One (1) Truck unloading and loading rack has room for two trucks and has two pumps with headers which lead to the tank farm. The maximum combined pumping rate is 30,000 gallons per hour. This facility was constructed in 1965.
- ii. Container Filling Station

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8-4(1), the Permittee shall limit the VOC emissions to 49.9 tons per twelve (12) consecutive month period, such that the requirements of the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

D.1.2 Hazardous Air Pollutants (HAP) [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8-4(1), the Permittee shall limit the emissions of any single HAP to 4.9 tons per twelve (12) consecutive month period and the emissions of any combination of HAPs to 12.4 tons per twelve (12) consecutive month period such that the requirements of the Part 70 Operating Permit Program 326 IAC 2-7 shall not apply.

Compliance Determination Requirements

D.1.3 Compliance Determination for VOCs and HAPs

Compliance with the emissions limitations in conditions D.1.1 and D.1.2 shall be based on monthly emissions calculations using the TANKS III Program and emissions calculations for loading losses from trucks, railcars and drum and tote filling operations contained in AP-42 Section 5.2.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain the following records:
 - 1) monthly data generated using TANKS III program in electronic or hard copy format, and
 - 2) monthly loading loss emissions calculations for the truck, railcar and container filling on operations.
- (b) Pursuant to 40 CFR Part 60.110b(b) the Permittee is required to keep records of the design capacity of tanks 15, 25 and 26 in accordance with 40 CFR Part 60.116(a) and (b) for the life of the source.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the addresses 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 calendar quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Insignificant Emitting Activities 2.1 million Btu per hour boiler fired with natural gas.
--

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-2-2 the Particulate emissions from the 2.1 million Btu per hour boiler is limited to less than 0.6 pounds per million Btu of heat input.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the Particulate Matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Ashland Chemical Company
Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
FESOP No.: F097-5455-00186

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:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 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 MANAGEMENT
COMPLIANCE DATA SECTION**

and

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

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

Source Name: Ashland Chemical Company
Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
FESOP No.: F097-5455-00186

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the ERMD and OAM, within four (4) business hours; and CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12
9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) CThe Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION
 DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Ashland Chemical Company
 Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
 Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
 FESOP No.: F097-5455-00186
 Facility: Bulk Chemical Storage and Packaging Operation
 Parameter: Volatile Organic Compound Emissions
 Limit: 49.9 tons of VOC per twelve consecutive month period, rolled monthly

YEAR: _____

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

- 9 No deviation occurred in this quarter.
- 9 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 MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION
 DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Ashland Chemical Company
 Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
 Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
 FESOP No.: F097-5455-00186
 Facility: Bulk Chemical Storage and Packaging Operation
 Parameter: Hazardous Air Pollutant Emissions
 Limit: 4.9 tons of an individual HAP per twelve consecutive month period, rolled monthly.

YEAR: _____

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

- 9 No deviation occurred in this quarter.
- 9 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 MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION
 DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Ashland Chemical Company
 Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
 Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
 FESOP No.: F097-5455-00186
 Facility: Bulk Chemical Storage and Packaging Operation
 Parameter: Hazardous Air Pollutant Emissions
 Limit: 12.4 tons of any combination of HAPs per twelve consecutive month period, rolled monthly.

YEAR: _____

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

- 9 No deviation occurred in this quarter.
- 9 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 MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY COMPLIANCE REPORT**

Source Name: Ashland Chemical Company
 Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
 Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
 FESOP No.: F097-5455-00186

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

**Indiana Department of Environmental Management
Office of Air Management
and
Indianapolis Environmental Resources Management Divisions
Air Quality Management Section**

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Background And Description

Source Name: Ashland Chemical Company
Source Location: 8315 E. 33rd Street, Indianapolis, Indiana 46226
County: Marion
SIC Code: 5169
Operation Permit No.: F097-5455-00186
Permit Reviewer: Mr. Patrick Coughlin

The Environmental Resource Management Division (ERMD), Air Quality Management Section has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Ashland Chemical Company relating to the operation of bulk chemical and solvent packaging and distribution operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- a. Tank 1, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- b. Tank 2, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- c. Tank 3, fixed roof tank with a storage capacity of 14,100 gallons, constructed in 1965.
- d. Tank 4, fixed roof tank with a storage capacity of 15,060 gallons, constructed in 1965.
- e. Tank 5, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- f. Tank 6, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- g. Tank 7, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- h. Tank 8, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- i. Tank 9, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- j. Tank 10, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- k. Tank 11, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- l. Tank 12, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- m. Tank 13, fixed roof blending tank with a storage capacity of 8,239 gallons, constructed in 1965.
- n. Tank 14, fixed roof tank with a storage capacity of 10,135 gallons, constructed in 1991.
- o. Tank 15, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1990.
- p. Tank 16, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- q. Tank 17, fixed roof tank with a storage capacity of 6,806 gallons, constructed in 1965.
- r. Tank 18, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- s. Tank 19, fixed roof tank with a storage capacity of 12,307 gallons, constructed in 1965.
- t. Tank 20, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.

- u. Tank 21, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- v. Tank 22, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- w. Tank 23, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- x. Tank 24, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- y. Tank 25, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- z. Tank 26, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- aa. Tank 27, fixed roof tank with a storage capacity of 9,651 gallons, constructed in 1965.
- bb. Tank 28, fixed roof tank with a storage capacity of 9,913 gallons, constructed in 1965.
- cc. Tank 29, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- dd. Tank 30, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- ee. Tank 31, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- ff. Tank 36, fixed roof tank with a storage capacity of 8,097 gallons, constructed in 1986.
- gg. Three (3) railcar unloading stations with pipes which lead underground to two risers at the truck unloading rack. The pipes from two of the rail car unloading stations merge underground before rising at the truck load out station. At the truck loading rack there are two pumps and headers which lead to the tank farm. The maximum combined pumping rate is approximately 30,000 gallons per hour. This facility was constructed in 1965.
- hh. One (1) Truck unloading and loading rack has room for two trucks and has two pumps with headers which lead to the tank farm. The maximum combined pumping rate is 30,000 gallons per hour. This facility was constructed in 1965.
- ii. Container Filling Station

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- a) Natural Gas-fired combustion sources with heat input less than ten million (10,000,000) Btu per hour.
- b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- c) Application of oils, greases, lubricants or other nonvolatile materials applied as a temporary protective coating.
- d) Cleaners and solvents characterized as follows:
 - i) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psia measured at 38 degrees C (100 °F) or:
 - ii) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psia measured at 20 degrees C (68 °F) .the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- e) Paved and unpaved roads and parking lots with public access.
- f) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- g) On-site fire and emergency response training approved by the department.

- h) Rail car unloading station dedicated for the unloading of aircraft de-icing fluid. The aircraft de-icing fluid is made up of an aqueous solution of potassium acetate. The potential emissions of VOC from this facility are negligible because the material transferred is an aqueous salt solution.

Existing Approvals

This source has been operating under the following approvals:

- (1) Operating Permit issued December 10, 1990 for solvent storage and handling, includes 29 fixed roof storage tanks.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on March 14, 1996. Additional information was received on November 7, 1996, and November 18, 1996 .

Please note that this source submitted a transition application for permit by rule on December 10, 1996 as an alternative to submitting the information necessary to make the application an administratively complete Title V application.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (pages 1 through 5 in appendix A).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	175.97

CO	Negligible
NO _x	Negligible

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

See attached spreadsheets for detailed calculations (pages numbers 1 through 5 in Appendix A).

HAP	Potential Emissions (tons/year)
Methylene Chloride	22
1,1,1 Trichloroethane	10
Hexane	8
TOTAL	>25

See attached spreadsheets for detailed calculations (pages 2 of 4 in Appendix A).

- (a) The potential emissions (as defined in the Indiana Rule) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

And

- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

And

- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

And

- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD and Emission Offset applicability.

Limited Potential To Emit

- (a) To simplify recordkeeping and to accommodate unpredictable variations in production, the source has accepted federally enforceable production limitations that limit potential to emit VOC to less than 91 tons per 12 consecutive month period. This limit was established at 11/12ths of 99 tons per year to eliminate the effect that daily variations would have on any 365 day period. This limit consists of:

- (i) 49.9 tons per year for the significant activities; and

- (ii) 0.05 tons per year for the insignificant activities.
- (b) The source has accepted a limit on potential to emit of 8.3 tons in any consecutive twelve month period for any single HAP and 22 tons in any consecutive twelve month period for any combination of HAPs.

And

- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/ facility	VOC	HAPs
Rail Car/Truck Unloading, Tanks and Filling of Containers	49.9	4.9 tons of highest individual HAP 12.4 tons of any Combination of HAPs
Insignificant Activities Boilers	0.05	Negligible
Total Emissions	49.95	4.9 tons of highest individual HAP 12.4 tons of any Combination of HAPs

County Attainment Status

The source is located in Marion County.

Pollutant	Status
TSP	Nonattainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) Storage Tanks 15, 25 and 26 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.100b, Subpart Kb). Since tank 15 was installed after July 23, 1984 and has a storage capacity greater than 40 cubic meters and less than 75 cubic meters the only

requirements of this subpart are 60.116 (a) and (b). Since tanks 25 and 26 were installed after July 23, 1984 and have individual storage capacities of greater than 75 cubic meters and less than 151 cubic meters and stores liquids with a vapor pressure less than 15 kPa the only applicable requirements of this subpart are 60.116 (a) and (b). This regulation does not apply to the other tanks based on the date constructed and/or the storage capacity of the tank.

- (b) New Source Performance Standard for Synthetic Organic Chemical Manufacturing Operations 40 CFR Parts 60.480, 60.610, 60.660 and 60.700 (Subpart VV, III, NNN, and RRR) do not apply to this source since this source does not produce chemicals through chemical synthesis. This facility is only involved with blending of chemicals as received, packaging of the chemicals and the distribution of chemicals.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63.

State Rule Applicability - Entire Source

326 IAC 2-2 Prevention of Significant Deterioration (PSD)

The PSD regulation does not apply to this source, since this source is not on the list of 28 and does not have the potential to emit greater than 250 tons per year. This source is not a major source under the PSD regulation.

326 IAC 2-7 (Federally Enforceable State Operating Permit Program)

Ashland Chemical Company will limit the emissions of HAPs and VOCs from the bulk chemical packaging operation (includes all storage tanks, truck and rail loading stations, and drum and tote filling stations) as follows;

- a) 49.9 tons of VOC per twelve (12) consecutive month period, rolled monthly,
- b) 4.9 tons of any individual HAP per twelve (12) consecutive month period, rolled monthly, and
- c) 12.4 tons of any combination of HAPs per twelve (12) consecutive month period, rolled monthly.

Ashland chemical will document compliance with these emissions limitations by tracking all HAP and VOC emissions utilizing the TANKS III program and AP-42 (Section 5.2) emissions factors for loading losses from trucks, rail car and container filling operations

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3

(Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

326 IAC 8-4-3 does not apply since none of the tanks have a storage capacity of greater than 39,000 gallons.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

326 IAC 8-1-6 does not apply to any of the facilities at this source based on the individual facilities date of construction and the potential VOC emissions from the individual facilities.

326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating)

Ashland Chemical operates a 2.1 million Btu per hour boiler fired with natural gas. Since this boiler is located in Marion County and was installed prior to 1983 the particulate emissions are limited pursuant to 326 IAC 6-2-2. Pursuant to 326 IAC 6-2-2 the Particulate emissions from this boiler are limited to 0.6 pounds per million Btu of heat input. Based on AP-42 emission factors this boiler is in compliance with 326 IAC 6-2-2.

326 IAC 8-9 Volatile Organic Liquid Storage Vessels

This regulation does not apply to any of the storage vessels at this source since this source is not located in Clark, Floyd, Lake or Porter Counties.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time

period.

No compliance monitoring is required since this source has not any individual units with actual emissions greater than 25 ton and does not operate any control devices.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

This source has accepted federally enforceable air toxic emission limits of 4.9 tons per year for any single HAP and 12.4 tons per year for any combination of HAPs.

Conclusion

The operation of this Bulk Chemical Packaging Operation will be subject to the conditions of the attached proposed **FESOP No. F097-5455-00186**.

Point Source VOC Emissions

The source has requested no annual throughput limits be imposed, instead the source will be tracking the emissions of VOC using the TANKS III program and AP-42 emissions factors for tanker and container loading and unloading. Ashland Chemical has requested a VOC emissions limit of 49.9 tons per twelve (12) month rolling sum.

Bulk Loading Loss

	VOC
M = Molecular Weight	86.17
P = True Vapor Pressure	2.44
T = Temperature of blk. liq.	528
S = Saturation Factor	0.6
LL = Loading Loss	2.98

Potential Throughput (GPY) 31,536,000
 Potential Emissions (TPY) 46.94

Container Loading Loss

	VOC
M = Molecular Weight	86.17
P = True Vapor Pressure	2.44
T = Temperature of blk. liq.	528
S = Saturation Factor	1.45
LL = Loading Loss	7.19

Potential Throughput (GPY) 31,536,000
 Potential Emissions (TPY) 113.44

Tanks Standing Loss

Based on Tanks 2 Program VOC
 Potential Emissions (TPY) 15.58

Total VOC emissions

Potential Emissions (TPY) 175.97

Note tanks standing loss, and the container and bulk loading losses are based on the worst case VOL transferred at the facility

HAP Emissions

The Ashland Chemical has requested no annual throughput limits be imposed, instead the source will be tracking the emissions of HAPs using the TANKS III program and AP-42 emissions factors for tanker and container loading and unloading. Ashland Chemical has requested a emissions limit of 12.4 tons of and combination of HAPs and 4.9 tons of any individual HAP.

Equipment Leaks From Container Filling Operation

	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per drumming station	Pumping Rate (gal/hr)	Hours in active service (hr/yr)	Potential HAP	
						Throughput (gal/yr)	emissions (tons/yr)
Light Liquids (Worst Case)	Pumps	0.1087	1	3600	28	100800	0.0015
	Valves	0.0156	6	3600	28	100800	0.0013
	Flanges	0.0018	22	3600	28	100800	0.0006
							0.0034

Container Loading Loss

	Worst Case all other HAP	Methylene Chloride	1,1,1 Trichloroethane	Hexane
M = Molecular Weight	72.1	84.49	133.42	86.17
P = True Vapor Pressure	1.48	6.79	2.03	2.44
T = Temperature of blk. liq.	528	528	528	528
S = Saturation Factor	1.45	1.45	1.45	1.45
LL = Loading Loss	3.65	19.63	9.27	7.19
Potential Throughput (GPY)	31,536,000	2,232,000	2,232,000	2,232,000
Potential Emissions (TPY)	57.57	21.91	10.34	8.03

Bulk Loading Loss

	Worst Case HAP
M = Molecular Weight	72.1
P = True Vapor Pressure	1.48
T = Temperature of blk. liq.	528
S = Saturation Factor	0.6
LL = Loading Loss	1.51
Potential Throughput (GPY)	31,536,000
Potential Emissions (TPY)	23.82

Summary of any Combination of HAP Emissions

Sources	Potential
Bulk Loading Loss	23.82
Tanks (Tanks 2 Program)	4.55
Drumming Losses	57.57

Summary of Highest Individual HAPs

Pollutant	Potential
Methylene Chloride	21.91
1,1,1 Trichloroethane	10.34
Hexane	8.03

Fugitive VOC Emissions

Total Number of Tanks	31
Tanks dedicated to heavy liquids	25
Tanks dedicated to light liquids	6

Emissions Factors

Components	Light Liquids (lbs/hr)	Heavy Liquids (lbs/hr)
Pumps	0.1087	0.0471
Valves	0.0156	0.0005
Flanges	0.0018	0.0018

Operation	Pumping Rate (gal/hr)	Hours of Operation (hr/yr)	Limited Product Throughput (Gal/yr)	Unlimited Product Throughput (Gal/yr)
Rail Car Unloading	15,000	500	7,500,000	31,536,000
Tanker Truck Unloading	15,000	350	5,250,000	31,536,000
Container Filling	3,600	620	2,232,000	31,536,000

Storage Tank Equipment Leaks

Light Liquids	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per tank	Number of Tanks	Potential VOC	Limited PTE VOC
					emissions (tons/yr)	emissions (tons/yr)
Light Liquids	Valves	0.0156	1	25	1.7082	1.7082
	Flanges	0.0018	2	25	0.3942	0.3942
Heavy Liquids	Valves	0.0005	1	6	0.01314	0.01314
	Flanges	0.0018	2	6	0.094608	0.094608
					2.210148	2.210148

Rail Car Unloading Equipment Leaks

Light Liquids (Worst Case)	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per tank	Rail Car Loadout Stations	Potential VOC	Limited PTE VOC
					emissions (tons/yr)	emissions (tons/yr)
Light Liquids (Worst Case)	Pumps	0.1087	1	1	0.476106	0.027175
	Valves	0.0156	8	1	0.546624	0.0312
	Flanges	0.0018	13	1	0.102492	0.00585
					1.125222	0.064225

Truck Unloading Equipment Leaks

Light Liquids (Worst Case)	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per tank	Truck Loadout Stations	Potential VOC	Limited PTE VOC
					emissions (tons/yr)	emissions (tons/yr)
Light Liquids (Worst Case)	Pumps	0.1087	1	1	0.476106	0.0190225
	Valves	0.0156	6	1	0.409968	0.01638
	Flanges	0.0018	22	1	0.173448	0.00693
					1.059522	0.0423325

Container Filling Equipment Leaks

Light Liquids (Worst Case)	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per drumming station	Container Filling Stations	Potential VOC	Limited PTE VOC
					emissions (tons/yr)	emissions (tons/yr)
Light Liquids (Worst Case)	Pumps	0.1087	1	1	0.476106	0.033697
	Valves	0.0156	4	1	0.273312	0.019344
	Flanges	0.0018	20	1	0.15768	0.01116
					0.907098	0.064201

Total Potential VOC Fugitive Emissions (TPY) 5.30
 Total PTE VOC Fugitive Emissions (TPY) 2.38

Note that the none of the flanges valves and pumps are in service 8760 hours per year except for the flanges and valves associated with the tanks.

Insignificant Emitting ActivitiesHeat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

2.1

18.4

Pollutant	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.70	13.70	0.60	100.00	5.30	21.00
Potential Emission in tons/yr	0.13	0.13	0.01	0.92	0.05	0.19

Source Summary

Point Sources of VOCs	Potential VOC emissions (TPY)
Tanker Truck/Railcar Loading Losses	46.94
Tank Losses (Tanks 2 Program)	15.58
Container Loading Loss	113.44
Insignificant Emitting Activity (2.1 MMBtu Boiler)	0.05
Total VOC Emissions	175.97

Fugitive Sources of VOCs	Potential VOC emissions (TPY)
Leaks Tanks (Valves & Flanges)	2.21
Leaks Truck Loadout (Valves, Flanges, Pumps)	1.06
Leaks Rail Car Loadout (Valves, Flanges, Pumps)	1.13
Leaks Drumming Station (Valves, Flanges, Pumps)	0.91
Total Fugitive VOC Emissions	5.30

Total Fugitive and Point Source emissions of VOC 181.27

Point and Fugitive Source of HAPs	Potential Worst Case Combination HAP emissions (TPY)
Tanker Truck/Railcar Loading Losses	23.82
Tank Losses (Tanks 2 Program)	4.55
Container Loading Loss	57.57
Leaks Tanks (Valves & Flanges)	2.21
Leaks Truck Loadout (Valves, Flanges, Pumps)	1.06
Leaks Rail Car Loadout (Valves, Flanges, Pumps)	1.13
Leaks Drumming Station (Valves, Flanges, Pumps)	0.91
Total emissions of any combination of HAPs	91.25

Highest Individual HAPs	Potential Worst Case Individual HAP emissions (TPY)
Methylene Chloride	21.91
1,1,1 Trichloroethane	10.34
Hexane	8.03

**Indianapolis Environmental Resource Management Division(ERMD)
Air Quality Management Section**

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

**Ashland Chemical Company
8315 E. 33rd Street
Indianapolis, Indiana 46226**

F097-5455-00186

On December 6, 1997, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Ashland Chemical Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a bulk chemical packaging and distribution operation. The notice also stated that ERMD proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

During the 30 public notice period ERMD received comments from Ashland Chemical Company and the Indiana Department of Environmental Management (IDEM). ERMD response to these comments are stated below:

Ashland Chemical Comments

1. Regarding Section A.2 and D.1(a-ff), there appears to be some confusion regarding the dimensions and capacities of the various tanks located at our facility. For your convenience, I have included an accurate tank list. Please incorporate these corrections into the FESOP.

ERMD has revised the facility descriptions. ERMD has re-evaluated the regulatory applicability for the tanks based on the revised tank capacities and installation dates and has determined that there are no new regulatory requirements.

2. Regarding Sections A.2 and D.1(gg), the three railcar unloading stations lead underground to two risers at the truck loading rack. At the truck unloading rack are two 12-15000 gallon per hour pumps and a header of pipes which lead to the tank farm. Thus, two railcars could, theoretically, be unloaded simultaneously at a rate of 30,000 gallons per hour.

ERMD has revised the facility description.

3. Regarding Section A.2 and D.1(hh) the truck loading rack, as described above has room for two trucks and has two pumps. Therefore, two trucks could be unloaded simultaneously at a rate of approximately 30,000 gallons per hour.

ERMD has revised the facility description.

4. Regarding Section A.3, there is an additional insignificant emissions unit not listed. There is a fourth railcar siting. This additional siting is used exclusively for loading and unloading aircraft deicing fluid, which made up of an aqueous solution of potassium acetate. The potential emissions from this facility are negligible since the material transferred is an aqueous salt solution. Therefore, this emissions unit qualifies as insignificant pursuant to GSD-10a.

ERMD will add this facility to the list of insignificant emitting activities.

5. Regarding Section D.1.5(a), Ashland is currently using a Microsoft Access based program called AACIS (Ashland Air Compliance Information System) to track monthly and annual emissions from our facilities. This program uses inventory data from our inventory tracking system to account for emissions generated by the movement of materials through our facilities. The data from TANK III is transferred electronically to AACIS. Thus, we request that the wording of D.1.5(a)(1) be changed to read "monthly data generated using TANKS III program in electronic or hardcopy format"

ERMD has made the requested change.

6. Regarding Section D.1.6, based on the fact that our total annual VOC's were 3.49 tons in 1995 and 4.92 tons in 1996, Ashland believes that we are in no danger of exceeding our annual emissions limit of 49.9 tons per year. We also believe that both the agencies and our resources are better served if the reporting frequency were changed to biannual pursuant to 326 IAC 2-8-4(3)(C)(i). Ashland requests that we be required to submit biannually emissions reports and that one of these reports be due at the same time as the annual emissions inventory.

It is ERMD policy that all FESOP sources submit compliance reports on a quarterly basis, therefore the requirement for quarterly reporting was not changed.

7. Regarding Section D.1.4, we believe that Ashland should not be required to prepare a preventative maintenance plan because we do not currently utilize any add-on air pollution emissions control devices.

Based on IDEM criteria none of the facilities listed in Ashland Oil Companies FESOP are required to have a Preventive Maintenance Plan. Therefore ERMD has removed condition D.1.4. and renumbered the preceding conditions.

IDEM Comment

1. Since there are no controls, would it be easier to limit throughput in gallons of product loaded and unloaded from trucks for the FESOP, than to have VOC, HAP, and Total HAP limits for a 12 consecutive month period.

Ashland Chemical has specifically requested that compliance be determined based on emissions calculations rather than a throughput limit in order to preserve operational flexibility.