

**PART 70 OPERATING PERMIT**  
**Indiana Department of Environmental Management**  
**Office of Air Quality**  
**and**  
**City of Indianapolis, Office of Environmental Services**

**Reilly Industries, Inc.**  
**1500 South Tibbs Avenue**  
**Indianapolis, Indiana 46242**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T097-7552-00315	
Issued by:	Issuance Date: January 12, 2005
ORIGINAL SIGNED BY	Expiration Date: January 12, 2010
Janet G. McCabe, Assistant Commissioner Office of Air Quality	
ORIGINAL SIGNED BY	
John B. Chavez, Administrator Office of Environmental Services	

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary industrial organic chemical plant.

Responsible Official:	President
Source Address:	1500 South Tibbs Avenue, Indianapolis, Indiana 46242
General Source Phone Number:	(317) 247-8141
SIC Code:	2899 and 2869
County Location:	Marion
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Nonattainment NSR Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) natural gas-fired boiler (identified as unit 11-112E) having a maximum heat input capacity of 14.4 MMBtu per hour, used to recover waste heat from the waste gas flare (identified as unit CP41GCS) at Plant 41. This boiler was constructed in 1953 and exhausts to stack S-29-001.
- (b) One (1) boiler (identified as unit 28-186N) having a maximum heat input capacity of 36.8 MMBtu per hour and capable of being fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No.6, process emissions, and hazardous waste. This boiler was constructed in 1959 and exhausts to stack S-29-002.
- (c) One (1) boiler (identified as unit 30-2726S) having a maximum heat input capacity of 39.3 MMBtu per hour and fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No.6, process emissions, and hazardous waste. This boiler was constructed in 1964 and exhausts to stack S-29-003.
- (d) One (1) boiler (identified as unit 70-2722W) having a maximum heat input capacity of 91.8 MMBtu per hour and fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No. 6, process emissions, and hazardous waste. This boiler was constructed in 1969 and exhausts to stack S-29-004.
- (e) One (1) natural gas-fired boiler (identified as unit CB600-300) having a maximum heat input capacity of 25.1 MMBtu per hour. The boiler also burns miscellaneous emissions from the wastewater treatment plant. This boiler was installed in 1990 and exhausts to stack S-29-005.
- (f) One (1) natural gas-fired boiler (identified as unit CN5-400) having a maximum heat input capacity of 61.1 MMBtu per hour. This boiler was constructed in 1995 and exhausts to stack S-29-006.

- (g) One (1) natural gas-fired boiler (identified as unit CB-70K) having a maximum heat input capacity of 91.1 MMBtu per hour. This boiler may also be fired using fuel oils No.1, No.2, No.4, No.5, and No.6, and process emissions. This boiler was installed in 1999 and exhausts to stack S-29-007.
  
- (h) Eleven (11) process heaters, including:
  - (1) One (1) Born heater (identified as unit 722804) having a maximum heat input capacity of 6.7 MMBtu per hour and fired using natural gas and/or process emissions. This unit was installed in 1972.
  - (2) One (1) Born hot oil heater (identified as unit BX2707V) having a maximum heat input capacity of 16.0 MMBtu per hour and fired using natural gas and/or process emissions. This unit was installed in 1967 and exhausts to stack S-27-001.
  - (3) One (1) Born heater (identified as unit BXS2706Q) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas and/or process emissions. This unit was installed in 1962.
  - (4) One (1) Born heater (identified as unit BS2740Q) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas, fuel oil #5, and/or process emissions. This unit was installed in 1963.
  - (5) One (1) Born heater (identified as unit BT2728S) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas, fuel oil #5, and/or process emissions. This unit was installed in 1964.
  - (6) One (1) BM Furnace (identified as unit BM2724W) having a maximum heat input capacity of 21.38 MMBtu per hour and fired using natural gas, and fuel oil #5. This unit was installed in 1969 and exhausts to stack S-27-003.
  - (7) One (1) BD Furnace (identified as unit BD2714V) having a maximum heat input capacity of 15.0 MMBtu per hour and fired using natural gas, fuel oil #5, and/or process gas. This unit was installed in 1968 and exhausts to stack S-27-002.
  - (8) One (1) Born heater (identified as unit EP2729Q) having a maximum heat input capacity of 3.0 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1963.
  - (9) One (1) Born Furnace (identified as unit 732714) having a maximum heat input capacity of 56.5 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1974 and exhausts to stack S-27-005.
  - (10) One (1) CS Kettle equipped with a 5 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.
  - (11) One (1) CS Still equipped with an 8.48 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.
  
- (i) Wastewater handling operations, including one (1) Wastewater Treatment Plant, constructed in 1979, having a nominal throughput capacity of 350 gallons of wastewater per minute. The Wastewater Treatment Plant treats wastewater from Plants 27, ~~28~~ 38, 40, 41, 47, and 48 and offsite wastewater. Plant sewers are pumped to wastewater storage tanks for processing. Depending on the contents of the wastewater, the wastewater may be pH adjusted, clarified, filtered, and/or steam stripped as needed prior to discharge to the POTW. The Wastewater Treatment Plant consists of one (1) large surge volume tank (identified as the North API), four (4) wastewater storage tanks (identified as tanks 15, 16, 17, and 18), one (1) neutralization tank, one (1)

clarification/flocculation tank, one (1) plate and frame filter press, and one (1) steam stripper for press filtrate. The wastewater operations consist of two (2) Group 2 wastewater streams identified as 140 Bottoms (ammonia stripper bottoms) and 75 Flow (raffinate stripper bottoms).

- (j) Plant 27 used to manufacture pyridine and picolines. The plant was initially constructed in 1961 and consists of reactors, a product recovery unit, distillation columns, and two (2) cooling towers. A catalyst regenerator (identified as unit BX27REG) is also located in this plant. The catalyst regenerator, constructed in 1990, has emissions of particulate matter that are controlled using an external cyclone (with same ID as the regenerator), which exhausts to stack S-27-006. A molecular sieves regenerator, constructed in 1990, with VOC emissions controlled by a scrubber, is also located at this plant.
- (k) Plant 38 used to manufacture precursors to various grades of vitamin B-3. The plant was initially constructed in 1967 and consists of the following emission units:
  - (1) Reactors;
  - (2) Separators;
  - (3) An evaporator with emissions controlled by a scrubber;
  - (4) One (1) packaging facility consisting of the following:
    - (i) one (1) mill (identified as 28-MB), with non-vented pneumatic conveying system,
    - (ii) One (1) pneumatic conveying system identified as Vacuum Receiver 28-VR (known as the hurricane blower) installed in 1997, with a maximum operating capacity of 6,750 pounds per hour. This unit exhausts at stack S-28-002.
    - (iii) One pick-up collector (known as central vac), installed in 1997, with a maximum operating capacity of 150 pounds per hour. This unit exhausts at stack S-28-003.

And controlled by the following two (2) baghouses:

  - (i) Micro Pul (known as the downstairs collector), installed in 1991, with a maximum operating capacity of 670 pounds per hour, exhausting at stack S-28-004, and
  - (ii) Penthouse collector (known as the MAC dust collector), installed in 2000, with a maximum operating capacity of 1,500 pounds per hour, exhausting at stack S-28-001.
- (l) Plant 41 used to manufacture pyridine and picoline derivatives and picolines. The plant was initially constructed in 1968. Plant 41 consists of the following facilities:
  - (1) Reactor;
  - (2) Separation facility with emissions controlled using one (1) 8.0 MMBtu per hour waste gas incinerator (identified as unit CP41GCS), which exhausts to stack S-41-001 or S-29-001;
  - (3) Distillation.
- (m) Plant 48, used to manufacture a variety of specialty chemicals. The plant was initially constructed in 1972 and consists of reactors (with emissions controlled by a scrubber) and distillation facilities.

- (n) Plant 40 is used to dehydrate 2-picolinic acid and 4-picolinic acid with caustic to produce vinyl pyridine. The plant was initially constructed in 1969. Plant 40 consists of the following process units: reactor, separation, distillation, and vent tank. Emissions are vented through six vents identified as follows:
- (1) Column #3 Atmospheric Vent (S/V 40/001) used to vent emissions from the separation facilities;
  - (2) Receiver Atmospheric Vents (S/V 40-002A, 40-002B, and 40-002C) used to vent emissions from the distillation facilities;
  - (3) Still Atmospheric Vent (S/V 40-002C) used to vent emissions from the distillation facilities; and
  - (4) Vent tank (S/V 40-004) used to vent emissions from Columns 1, 2, and 4.
- (o) Plant 47, used to manufacture a variety of specialty chemicals. The plant was initially constructed in 1979 and consists of the following facilities:
- (1) Reactor, controlled by a scrubber
  - (2) Distillation
  - (3) Separation
  - (4) One (1) 0.4 MMBtu per hour waste gas flare (identified as unit HC47GFS), used to control emissions from Plant 47. This unit was installed in 1979 and exhausts to stack S-47-001.
  - (5) One (1) CS Kettle equipped with a 5 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.
  - (6) One (1) CS Still equipped with an 8.48 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) storage tank, identified as 236, located at Plant 41, having a maximum storage capacity of 32,005 gallons and used to store benzene. This storage tank was constructed 1980.
- (b) One (1) storage tank (identified as T-254) having a maximum storage capacity of 19,753 gallons and used to store benzene. This storage tank was constructed May 1990.
- (c) The following storage tanks with storage capacities less than 10,000 gallons, which may be used to store benzene:

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
Plant 27	212	6,101	1980
Plant 41	211	6,101	1980
	213	6,101	1980

- (d) Three (3) storage tanks (identified as T-200, T-201, and T-202) located at Plant 27, each with a storage capacity of 51,508 gallon, and used to store formaldehyde. These tanks were constructed in 1992.

- (e) Nine (9) storage tanks subject to 40 CFR 60, Subpart Kb and 326 IAC 12:

Plant Location	Tank ID	Storage Capacity (gallons)	Constructed on or Before
Plant 27	118	26,227	1989
Plant 29	2969	85,308	1996
Plant 40	359	21,997	1991
	360	21,997	1991
	372	21,997	1994
	373	21,997	1994
Plant 41	235	31,773	1995
Plant 47	2652	12,442	1995
Wastewater Treatment Plant (Plant 49)	CL-101	90,243	1991

- (f) Nineteen (19) storage tanks subject to 326 IAC 12:

Plant Location	Tank ID	Storage Capacity (gallons)	Date Constructed
Plant 26	2647	10,575	1994
	2650	16,921	1995
	2651	16,921	1995
Plant 40	305	15,028	1989
	366	11,750	1989
	367	11,750	1989
Plant 41	11	15,274	1989
	30	15,274	1989
	33	15,274	1997
	35	15,274	1991
	37	15,274	1994
	225	19,858	1996
Plant 48	536	11,750	1989
	537	11,750	1997
	538	11,750	1997
Wastewater Treatment Plant (Plant 49)	4927	11,844	1991
	107	16,921	1991
	110	12,796	1991
	T-101	13,536	1991

- (g) Four (4) pressurized storage tanks consisting of the following:

- (1) Two (2) pressurized storage tanks (identified as T-260 and T-261), located at Plant 27 and used to store propionaldehyde, each with a maximum storage capacity of 42,600 gallons. These storage tanks were constructed prior to 1984.
- (2) Two (2) pressurized storage tanks (identified as T-262 and T-263), located at Plant 27 and used to store acetaldehyde, each with a maximum storage capacity of 300,000 gallons. These storage tanks were constructed prior to 1984.

- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (i) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (j) Cold cleaning operating with potential emissions of less than three (3) pounds per hour (lbs/hr) or fifteen (15) pounds per day (lbs/day) of VOC.
- (k) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (l) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

- (m) Combustion source flame safety purging on startup.
- (n) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (o) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (p) Cleaners and solvents characterized as follows: (A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or; B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (q) Closed loop heating and cooling systems.
- (r) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (s) Heat exchanger cleaning and repair.
- (t) Paved and unpaved roads and parking lots with public access.
- (u) Asbestos abatement projects regulated by 326 IAC 14-10.
- (v) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (w) 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.
- (x) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (y) Stationary fire pumps.
- (z) Purge double block and bleed valves.
- (aa) Filter or coalescer media changeout.
- (bb) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (cc) Insignificant storage tanks with VOC emissions less than 3 pounds per hour or 15 pounds per day; single HAP emissions less than 5 pounds per day or 1 ton per year; and combined HAP emissions less than 12.5 pounds per day or 2.5 tons per year, including:

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
Plant 26	2600	2,961	1974
	2603	NA	1983
	26007	2,961	1974
	2601	2,961	1974
	2602	2,961	1974
	2604A	3,948	1983
	2605A	1,763	1980
	2606A	1,763	1980
	2607	1,316	1980

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	2608	1,316	1980
	2609A	2,133	1980
	2610	2,133	1980
	26101A	2,133	1980
	26102C	2,133	1980
	26103A	2,133	1980
	26104A	2,133	1980
	2611A	2,133	1982
	2612A	2,133	1982
	2613	2,133	1978
	2614	2,133	1978
	2615	2,133	1980
	2616	2,133	1980
	2617	2,133	1980
	2618A	6,792	1980
	26199	846	1980
	2619A	564	1980
	2620A	2,538	1980
	2621A	2,538	1980
	2622A	2,538	1980
	2623A	6,792	1980
	2624	6,792	1980
	2625	6,792	1980
	26266A	2,138	1980
	2626B	2,138	1980
	2628	3,305	1980
	26299	846	1980
	2630A	2,961	1974
	2631A	2,961	1974
	2632A	2,961	1974
	2633	2,961	1974
	2634A	2,961	1974
	2635A	2,961	1974
	2636	2,961	1974
	2637	6,792	1974
	2638	7,614	1974
	2639	7,614	1974
	2640	7,614	1974
	2641A	4,888	1980
	2642A	4,888	1980
	2643A	4,888	1980
	2644	7,614	1974
	2645A	10,188	1974
	2648	10,152	1995
	2646	3,760	1980
	2649	9,400	1995
	2693A	881	1980
	2694	1,269	NA
	2696	1,469	1980
	2697	1,469	1980
	2698A	1,469	1980
Plant 27	60	259,095	1980
	61	259,095	1980
	62	259,095	1980
	63	259,095	1980
	67	259,095	1980
	70	259,095	1980
	71	259,095	1980
	72	259,095	1980
	73	259,095	1980
	101	51,702	1961
	102	51,702	1980
	103	51,702	1980
	105	102,369	1963
	106	132,192	1980
	107	132,192	1980
	108	132,192	1980
	109	132,192	1980
	110	132,192	1980
	112	51,702	1980

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	113	51,702	1980
	116	51,702	1980
	117	51,702	1980
	200	51,702	1980
	201	51,702	1980
	202	51,702	1980
	203	51,702	1980
	204	51,702	1980
	205	51,702	1980
	206	51,702	1980
	207	51,702	1961
	208	19,858	1962
	209	19,858	1980
	210	19,858	1980
	233	7,638	1980
	234	7,638	1980
	240	19,858	1980
	241	19,858	1980
	242	19,858	1980
	243	19,858	1980
	244	19,858	1980
	250	19,858	1980
	251	19,858	1980
	252	19,858	1980
	253	19,858	1980
	254	19,858	1980
	257	2,979	1980
	270	25,381	1980
	271	8,813	1980
	272	8,813	1980
	273	8,813	1980
	274	28,287	1980
	299	5,264	1980
	411	19,858	1980
	412	19,858	1980
	413	19,858	1980
	414	19,858	1980
	415	19,858	1980
	421	19,858	1980
	422	19,858	1980
	423	19,858	1980
	424	19,858	1980
	425	19,858	1980
	431	19,858	1980
	432	19,858	1980
	433	19,858	1980
	434	19,858	1980
	435	19,858	1980
	441	19,858	1980
	442	19,858	1980
	443	19,858	1980
	444	19,858	1980
	445	19,858	1980
	451	19,858	1980
	452	19,858	1980
	453	19,858	1980
	454	19,858	1980
	455	19,858	1980
	457	4,888	1993
	458	4,888	1993
	528	13,154	1980
	529	13,154	1980
	600	6,169	1973
	601	20,728	1973
	602	20,728	1973
	603	20,728	1973
	604	20,728	1973
	605	20,728	1973
	606	20,728	1973
	607	29,940	1973

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	608	29,940	1973
	609	50,668	1996
	610	27,637	1995
	611	29,940	1971
	612	29,940	1973
	620	29,940	1969
	621	29,940	1980
	622	29,940	1980
	630	29,940	1980
	631	29,940	1980
	632	29,940	1980
	640	98,703	1980
	641	98,703	1980
	650	30,063	1980
	651	30,063	1980
	699	5,264	1973
Plant 29	2938	44,945	1980
	2939	44,945	1980
	2964	259,095	1980
	2965	259,095	1980
	2966	259,095	1980
	2969	85,308	1996
Plant 38	501	5,200	1981
	502	5,200	1981
	506	5,200	1980
	507	5,200	1980
	508	5,200	1981
	509	5,200	1981
	516	5,200	1970
	517	5,200	1980
	518	5,200	1970
	519	5,200	1980
	521	11,750	1980
	522	11,750	1980
	523	11,750	1980
	524	20,305	1987
	525	20,305	1987
526	11,750	1965	
Plant 40	321	21,997	1980
	322	21,997	1980
	323	21,997	1980
	324	29,940	1980
	331	21,997	1980
	332	21,997	1980
	333	29,940	1980
	334	29,940	1980
	335	21,997	1997
	341	21,997	1980
	342	21,997	1980
	343	21,997	1980
	344	21,997	1980
	350	21,997	1980
	351	21,997	1980
	352	21,997	1980
	353	21,997	1980
	354	11,750	1980
	355	11,750	1980
	356	11,750	1980
357	11,750	1980	
358	11,750	1980	
361	11,750	1980	
363	11,750	1980	
Plant 41	1	15,274	1980
	2	15,274	1980
	3	15,274	1980
	4	15,274	1980
	5	15,274	1980
	6	15,274	1980
	7	15,170	1980
	8	15,170	1980

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	9	15,274	1980
	10	13,227	1980
	12	15,274	1980
	13	15,274	1980
	14	15,274	1980
	15	15,274	1980
	16	15,274	1980
	17	15,274	1980
	18	15,274	1980
	19	15,274	1980
	21	5,585	1980
	23	2,735	NA
	24	2,735	NA
	25	2,003	NA
	26	2,009	1980
	30	15,274	1989
	31	15,274	1980
	32	15,274	1980
	34	15,274	1980
	36	15,274	1980
	38	5,949	1980
	40	16,351	1980
	43	6,169	1980
	44	6,169	1980
	45	6,169	1980
	46	6,169	1980
	47	6,169	1980
	48	6,169	1980
	56	9,988	NA
	57	8,065	1980
	214	6,169	1980
	215	19,858	1980
	216	19,858	1980
	217	19,858	1980
	218	19,858	1980
	219	19,858	1980
	220	19,858	1980
	221	19,858	1980
	222	19,858	1980
	223	19,858	1980
	224	19,858	1980
	225	19,858	1996
	226	19,858	1962
	227	19,858	1980
	228	19,858	1980
	229	19,858	1980
	230	19,858	1980
	232	20,851	1980
	236	7,820	1980
	298	1,269	1980
	299	5,264	NA
Plant 47	514	2,115	1980
	700	10,152	1981
	701	10,152	1981
	702	10,152	1980
	710	4,402	1981
	711	4,402	1981
	712	7,638	1980
	714	7,826	1981
	716	11,844	1980
	717	10,152	1981
	718	10,152	1981
	719	10,152	1981
	720	10,152	1981
	721	10,152	1981
	722	10,152	1981
	726	10,152	1981
	727	10,152	1981
	728	10,152	1981
	750	3,455	1979

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	751	3,455	1979
	752	3,455	1979
	753	3,455	1979
	754	3,455	1979
	755	3,455	1979
	756	3,455	1979
	757	3,455	1979
	758	3,455	1979
	759	3,455	1979
	760	3,455	1979
	761	3,455	1979
	762	3,455	1979
	763	3,455	1979
	764	3,455	1979
	766	6,363	1979
	770	6,363	1979
	771	6,363	1979
	772	8,531	1991
	774	10,152	1980
	775	21,151	1999
	776	21,151	1999
	777	10,152	1979
	778	10,152	1979
	779	10,152	1979
	790	13,513	Prior to 1984
	791	13,513	1980
	792	13,513	1980
	793	13,513	1980
	794	13,513	1973
	795	13,513	1980
	797	20,305	1998
	780	6,363	NA
	781	6,363	1991
	785	3,455	1979
	798	10,152	1997
	799	14,806	1980
Plant 48	401	14,394	NA
	405	5,182	1972
	406	5,182	1972
	530	11,750	1972
	531	11,750	1972
	532	11,750	1972
	535	11,750	1972
	540	6,463	1988
	541	6,463	1988
	542	6,463	1972
	543	6,463	1972
	545	6,463	1972
	546	6,463	1972
	547	6,463	1972
	548	6,463	1988
	550	6,463	1972
	551	6,463	1972
	552	6,463	1972
	553	6,463	1972
	556	6,463	1980
	557	6,463	1980
	558	9,342	1980
	599	1,904	1980
Wastewater Treatment Plant (Plant 49)	4915	82,911	1980
	4916	82,911	1980
	4917	476,595	1980
	4918	476,595	1980
	4919	19,858	1980
	4921	16,921	1980

NA – No data available.

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

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

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification 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) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and OES may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within sixty (60) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

OES

Telephone Number: (317) 337-2237  
Facsimile Number: (317) 327-2274

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

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

and

City of Indianapolis, Office of Environmental Services  
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 2-7-5(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(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.  

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, and OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or OES has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]
- (h) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determination regarding this source:
  - (1) The Niacinamide Packaging facility is not subject to the requirements of 326 IAC 8-5-3, synthesized pharmaceutical manufacturing operations, because no VOCs are used at this facility.
  - (2) (A) Plant 27, Plant 38 and Plant 41 are not subject to the requirements of 40 CFR 60, Subpart III – Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Process (326 IAC 12) because these plants
    - (i) Do not have an air oxidation unit; and
    - (ii) Do not produce as a product, co-product, by-product, or intermediate any of the chemicals listed in 40 CFR 60.617.
  - (B) Plants 40, 47, and 48 are not subject to the requirements of 40 CFR 60, Subpart III – Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes (326 IAC 12) because these plants do not produce as a product, co-product, by-product, or intermediate any of the chemicals listed in 40 CFR 60.617.
- (3) Plants 27, 38, 40, 41, 47, and 48 are not subject to the requirements of 40 CFR 60, Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12), because these plants do not produce any of the chemicals listed in 40 CFR 60.667 as a product, co-product, by-product, or intermediate.
- (4) None of the storage tanks at this facility are subject to 40 CFR 60, Subpart K because the storage tanks either have capacities of less than 40,000 gallons or they are not used to store petroleum liquids as defined in 40 CFR 60.111(b) and 40 CFR 60.111a(b).
- (5) None of the storage tanks at this facility are subject to the requirements of the New Source Performance Standards 40 CFR 60, Subpart Ka (326 IAC 12) because none of the storage tanks for for which construction, reconstruction, or modification commenced after May 19, 1978, and prior to July 23, 1984 have capacities of equal to or greater than 40,000 gallons and are not used to store petroleum liquids as defined in 40 CFR 60.111(b) and 40 CFR 60.111a(b).
- (6) The waste gas incinerator located at Plant 47 is not subject to the requirements of 40 CFR 60, Subpart E – Standards of Performance for Incinerators (326 IAC 12) because this incinerator does not burn solid waste. This incinerator doesn't meet the definition of an incinerator in 40 CFR 60.50.

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or OES 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 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, or OES 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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (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, OAQ, and OES on or before the date it is due.
  - (2) If IDEM, OAQ, and OES, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
  - (3) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
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 2-7 until IDEM, OAQ, and OES 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, OAQ, and OES, any additional information identified as being needed to process the application.

- (4) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, and OES fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 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 Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis, Office of Environmental Services  
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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(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 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act 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 is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.20 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2] [IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The application 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) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and OES within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or OES the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

#### C.4 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.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

#### C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or

before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

**C.8 Performance Testing [326 IAC 3-6]**

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

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

**C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

**C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90), the Permittee may extend the compliance schedule related to the equipment for an additional sixty (60) days provided the Permittee notifies:

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

in writing, prior to the end of the initial sixty (60) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

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

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

**C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( 2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( 2%) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, and OES, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, and OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan and Parametric Monitoring and SMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan, Operation, Maintenance and Monitoring (OMM) Plan, or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan, Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The emission statement should be submitted to:

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- and
- City of Indianapolis, Office of Environmental Services  
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, OAQ, OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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. Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

<b>Facility Description [326 IAC 2-7-5(15)]</b>	
(a)	One (1) natural gas-fired boiler (identified as unit 11-112E) having a maximum heat input capacity of 14.4 MMBtu per hour, used to recover waste heat from the waste gas flare (identified as unit CP41GCS) at Plant 41. This boiler was constructed in 1953 and exhausts to stack S-29-001.
(b)	One (1) boiler (identified as unit 28-186N) having a maximum heat input capacity of 36.8 MMBtu per hour and is capable of being fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No.6, process gas, and hazardous waste. This boiler was constructed in 1959 and exhausts to stack S-29-002.
(c)	One (1) boiler (identified as unit 30-2726S) having a maximum heat input capacity of 39.3 MMBtu per hour and fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No. 6, process gas, and hazardous waste. This boiler was constructed in 1964 and exhausts to stack S-29-003.
(d)	One (1) boiler (identified as unit 70-2722W) having a maximum heat input capacity of 91.8 MMBtu per hour and fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No. 6, process gas, and hazardous waste. This boiler was constructed in 1969 and exhausts to stack S-29-004.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)	

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-1-12]**

Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations), the particulate matter emissions from boilers 11-112E, 28-186N, 30-2726S, and 70-2722W shall be limited as follows:

<b>Boiler I.D.</b>	<b>PM Limitation</b>	
	<b>in Tons per year</b>	<b>in lbs per MMBtu</b>
11-112E	0.5	0.15
28-186N	Shall burn only natural gas	
30-2726S	7.8	0.15
70-2722W	3.5	0.15

**D.1.2 Sulfur Dioxide Emission Limitations (SO<sub>2</sub>) [326 IAC 7-4-2]**

Pursuant to 326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations), emissions of sulfur dioxide from boilers 11-112E, 28-186N, 30-2726S, and 70-2722W shall not exceed the emission rates provided in the following table:

<b>Boiler I.D.</b>	<b>SO<sub>2</sub> Emission Limitations</b>	
	<b>lbs per MMBtu</b>	<b>lbs per hour</b>
11-112E	Less than 0.05	Less than 0.05
28-186N	1.25	46.0
30-2726S	1.25	49.1
70-2722W	1.25	114.75

Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

**D.1.3 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]**

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The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to boilers 11-112E, 28-186N, 30-2726S, and 70-2722W as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

**D.1.4 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]**

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- (a) The affected sources are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three years after November 12, 2004.
- (b) The following emissions units comprise the affected source for the large gaseous fuel subcategory: 11-112E.
- (c) The following emissions units comprise the affected source for the large liquid fuel subcategory: 28-186N, 30-2726S, and 70-2722W
- (d) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected sources.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

**Compliance Determination Requirements**

**D.1.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-4-2][326 IAC 7-2-1]**

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Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions from boilers 28-186N, 30-2726S and 70-2722W do not exceed the limitations in Condition D.1.2 by:
  - (1) Providing vendor analysis of fossil fuel oil or other liquid fuel delivered, if accompanied by a vendor certification, or;
  - (2) Analyzing the fossil fuel oil or other liquid fuel sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Fossil fuel oil or other liquid fuel samples may be collected from the fuel tank immediately after the fuel tank is filled and before any fossil fuel oil or other liquid fuel is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.7 Visible Emissions Notations**

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- (a) Visible emission notations of boilers 30-2726S and 70-2722W stack exhausts shall be performed once per shift during normal daylight operations when burning fuel oil and hazardous waste. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fossil fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) To certify compliance when burning natural gas or process gas only or process gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of boilers 30-2726S and 70-2722W stack exhausts once per shift during normal daylight operations when burning fuel oil and hazardous waste.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.1.9 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

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(a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after November 12, 2004.

(b) The notification required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (e) One (1) natural gas-fired boiler (identified as unit CB600-300) having a maximum heat input capacity of 25.1 MMBtu per hour. The boiler also burns miscellaneous process gases from the wastewater treatment plant. This boiler was installed in 1990 and exhausts to stack S-29-005.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2(b)]

Pursuant to 326 IAC 6-1-2(b)(1)(Nonattainment Area Limitations), the particulate matter emissions from boiler CB600-300 shall be limited to 0.01 grains per dry standard cubic foot of natural gas.

#### D.2.2 General Provision Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

#### D.2.3 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to CB600-300, as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

#### D.2.4 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]

- (a) Boiler CB600-300 is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three years after November 12, 2004.
- (b) The following emissions unit comprises the affected source for the large gaseous fuel subcategory: CB600-300.
- (c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected source.

#### D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for boiler CB600-300.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.2.6 Record Keeping Requirements

- (a) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall maintain the following records:
- (1) Daily fuel records.
  - (2) A certification signed by the owner or operator that the records of the fuel usage represent all of the fuel combusted during the period. The natural gas and process gas fired boiler certification does not require the certification of the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of

any additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

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- (a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after November 12, 2004.

- (b) The notification required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (f) One (1) natural gas-fired boiler (identified as unit CN5-400) having a maximum heat input capacity of 61.1 MMBtu per hour. This boiler was constructed in 1995 and exhausts to stack S-29-006.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2(b)]

Pursuant to 326 IAC 6-1-2(b)(1)(Nonattainment Area Limitations), the particulate matter emissions from boiler CN5-400 shall be limited to 0.01 grains per dry standard cubic foot of natural gas.

#### D.3.2 General Provision Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

#### D.3.3 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source, as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

#### D.3.4 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]

- (a) The affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three years after the date of publication of the final rule for 40 CFR 63, Subpart DDDDD in the Federal Register.
- (b) The following emissions units comprise the affected source for the large gaseous fuel subcategory: CN5-400.
- (c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected source.

#### D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.3.6 Record Keeping Requirements

- (a) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall maintain the following records:
- (1) Daily fuel records.
  - (2) A certification signed by the owner or operator that the records of the fuel usage represent all of the fuel combusted during the period. The natural gas fired boiler certification does not require the certification of the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.7 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

---

(a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after November 12, 2004.

(b) The notification required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (g) One (1) natural gas-fired boiler (identified as unit CB-70K) having a maximum heat input capacity of 91.1 MMBtu per hour. This boiler may also be fired using distillate oil. This boiler was installed in 1999 and exhausts to stack S-29-007.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2(b)]

- (a) Pursuant to 326 IAC 6-1-2(b)(1)(Nonattainment Area Limitations), the particulate matter emissions from boiler CB-70K shall be limited to 0.01 grains per dry standard cubic foot of natural gas.
- (b) Pursuant to 326 IAC 6-1-2(b)(4)(Nonattainment Area Limitations), the particulate matter emissions from boiler CB-70K shall be limited to 0.15 pounds per million Btu when burning fuel oil.

#### D.4.2 PSD Emission Limitations for Sulfur Dioxide and Nitrogen Oxides [326 IAC 2-2]

The amount of distillate oil and distillate oil equivalents burned in boiler CB-70K shall not exceed 1,124 kgallons per twelve (12) consecutive month period, with compliance determined at the end of each month. The sulfur content of the fuel oil shall not exceed 0.5% by weight. For the purposes of determining compliance, burning 1 million cubic feet of natural gas is equivalent to burning 1.41 kgallon of distillate fuel.

Compliance with this condition ensures that both the SO<sub>2</sub> and NO<sub>x</sub> emissions from the boiler do not exceed 39.9 tons per year and makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.4.3 General Provision Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

#### D.4.4 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 12-1] [40 CFR 60, Subpart Dc]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO<sub>2</sub> emissions from boiler CB-70K shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

**D.4.5 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]**

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The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to boiler CB-70K, as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

**D.4.6 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]**

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- (a) The affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three years after November 12, 2004.
- (b) The following emissions units comprise the affected source for the large liquid fuel subcategory: CB-70K.
- (c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected source.

**D.4.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

**Compliance Determination Requirements**

**D.4.8 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2-1]**

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Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fossil fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:
  - (1) Providing vendor analysis of fossil fuel oil delivered, if accompanied by a certification; or
  - (2) Analyzing the oil sample to determine the sulfur content of the fossil fuel oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the rotary dryer, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

**Compliance Monitoring Requirements:**

**D.4.9 Visible Emissions Notations**

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- (a) Visible emission notations of boiler CB-70K stack exhaust shall be performed once per shift during normal daylight operations when burning fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not

counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.4.10 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1 and D.4.4, the Permittee shall maintain records in accordance with (1) through (6) below.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fossil fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fossil fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.4.2, the Permittee shall maintain records of the following:
  - (1) The amount and sulfur content of the distillate oil burned each month; and
  - (2) The amount of natural gas burned each month.
- (c) To document compliance with Condition D.4.9, the Permittee shall maintain records of visible emission notations of boiler CB-70K stack exhaust once per shift during normal daylight operations when burning fossil fuel oil.
- (d) To document compliance with Condition D.4.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.11 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

---

(a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after November 12, 2004.

(b) The notification required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)

D.4.12 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.4.2 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 quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**SECTION D.5**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]**

- (h) Eleven (11) process heaters, including:
- (1) One (1) Born heater (identified as unit 722804) having a maximum heat input capacity of 6.7 MMBtu per hour and fired using natural gas and/or process gas.
  - (2) One (1) Born hot oil heater (identified as unit BX2707V) having a maximum heat input capacity of 16.0 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1967 and exhausts to stack S-27-001.
  - (3) One (1) Born heater (identified as unit BXS2706Q) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas and/or process gas.
  - (4) One (1) Born heater (identified as unit BS2740Q) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas, fuel oil #5, and/or process gas.
  - (5) One (1) Born heater (identified as unit BT2728S) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas, fuel oil #5, and/or process gas.
  - (6) One (1) BM Furnace (identified as unit BM2724W) having a maximum heat input capacity of 21.38 MMBtu per hour and fired using natural gas, and fuel oil #5. This unit was installed in 1969 and exhausts to stack S-27-003.
  - (7) One (1) BD Furnace (identified as unit BD2714V) having a maximum heat input capacity of 15.0 MMBtu per hour and fired using natural gas, fuel oil #5, and/or process gas. This unit was installed in 1968 and exhausts to stack S-27-002.
  - (8) One (1) Born heater (identified as unit EP2729Q) having a maximum heat input capacity of 3.0 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1963.
  - (9) One (1) Born Furnace (identified as unit 732714) having a maximum heat input capacity of 56.5 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1974 and exhausts to stack S-27-005.
  - (10) One (1) CS Kettle equipped with a 5 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.
  - (11) One (1) CS Still equipped with an 8.48 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.

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

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.5.1 Particulate Matter Limitation (PM) [326 IAC 6-1-12]**

- (a) Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations), the particulate matter emissions from the heaters shall be limited as follows:

Heater	PM Limitation	
	in Tons per year	in lbs per MMBtu
722804	Shall burn only natural gas	
BX2707V	0.4	0.011
BXS2706Q	0.1	0.011
BS2740Q	2.0	0.15
BT2728S	2.2	0.15
BM2724W	Shall burn only natural gas	
BD2714V	3.1	0.15
EP2729Q	0.1	0.011
732714	7.5	0.15

- (b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from heaters SB2710P, and NB2720Q shall be limited to 0.03 grains per dry standard cubic foot.

**D.5.2 Sulfur Dioxide Emission Limitations (SO<sub>2</sub>) [326 IAC 7-2]**

- (a) Pursuant to 326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations), emissions of sulfur dioxide from the heaters shall not exceed the emission rates provided in the following table:

Heaters	SO <sub>2</sub> Emission Limitations	
	lbs per MMBtu	lbs per hour
722804	Less than 0.05	Less than 0.05
BX2707V	1.25	20.0
BXS2706Q	Less than 0.05	Less than 0.05
BS2740Q	1.25	7.5
BT2728S	1.25	7.5
BM2724W	1.25	26.3
BD2714V	1.25	18.8
EP2729Q	1.25	3.8
732714	1.25	45.0

- (b) Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

**D.5.3 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]**

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to BX2707V, BM2724W, BD2714V, EP2729Q, and 732714, as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

**D.5.4 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]**

- (a) The process heaters identified as BX2707V, BM2724W, BD2714V, EP2729Q, and 732714 are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three years after November 12, 2004.
- (b) The following emissions units comprise the affected source for the large gaseous fuel subcategory: BX2707V, BM2724W, BD2714V, EP2729Q, and 732714.

- (c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected source.

**D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the heaters 722804, BX2707V, BX2706Q, BS2740Q, BT2728S, BM2724W, BD2714V, EP2729Q, and 732714.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.5.6 Visible Emissions Notations**

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- (a) Visible emission notations of heaters BS2740Q, BT2728S, BM2724W, and BD2714V stack exhausts shall be performed once per shift during normal daylight operations when burning process gas. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.5.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.5.6, the Permittee shall maintain records of visible emission notations of process heaters 722804, BX2707V, BX2706Q, BS2740Q, BT2728S, BM2724W, BD2714V, EP2729Q, and 732714 stack exhausts once per shift.
- (b) To document compliance with Condition D.5.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.5.8 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]**

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- (a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after November 12, 2004.

(b) The notification required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.6

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (i) Wastewater handling operations, including one (1) Wastewater Treatment Plant, constructed in 1979, having a nominal throughput capacity of 350 gallons of wastewater per minute. The Wastewater Treatment Plant treats wastewater from Plants 27, 38, 40, 41, 47, and 48 and offsite wastewater. Plant sewers are pumped to wastewater storage tanks for processing. Depending on the contents of the wastewater, the wastewater may be pH adjusted, clarified, filtered, and/or steam stripped as needed prior to discharge to the POTW. The Wastewater Treatment Plant consists of one (1) large surge volume tank (identified as the North API), four (4) wastewater storage tanks (identified as tanks 15, 16, 17, and 18), one (1) neutralization tank, one (1) clarification/flocculation tank, one (1) plate and frame filter press, and one (1) steam stripper for press filtrate. The wastewater operations consist of two (2) Group 2 wastewater streams identified as 140 Bottoms (ammonia stripper bottoms) and 75 Flow (raffinate stripper bottoms).

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.6.1 General Provisions Relating to NESHAPs [326 IAC 20-1] [40 CFR 63, Subpart A] [326 IAC 14] [40 CFR 61, Subpart A]

- (a) The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the Wastewater Treatment Plant except when otherwise specified in 40 CFR 63, Subpart DD.
- (b) The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14, apply to the waste collection and treatment system except when otherwise specified in 40 CFR 61, Subpart FF.
- (c) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the miscellaneous organic chemical manufacturing affected source, as designated by 40 CFR 63.2440(b), except when otherwise specified in 40 CFR 63 Subpart FFFF. The Permittee must comply with these requirements on and after the effective date of 40 CFR 63 Subpart FFFF.
- (d) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (d) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.6.1, National Emissions Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturers - Notification Requirements.

#### D.6.2 National Emissions Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing [40 CFR Part 63, Subpart FFFF]

- (a) The affected source, the facility-wide collection of miscellaneous organic chemical manufacturing processing units (MCPUs) and heat exchange systems, wastewater, and waste management units that are associated with manufacturing materials described in 40 CFR 63.2435(b)(1), is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing, (40 CFR 63, Subpart FFFF), effective the date the rule is published in the *Federal Register*. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart FFFF on and after the date that is three years after the effective date of the rule, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to three years after the effective date of the rule. Since the applicable requirements associated with the

compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

- (b) The definitions of 40 CFR 63, Subpart FFFF at 40 CFR 63.2550 are incorporated by reference.
- (c) Pursuant to 40 CFR 63.2515, the Permittee shall submit the notifications in 40 CFR 63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:
  - (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than 120 days after the effective date of 40 CFR 63, Subpart FFFF; and
  - (2) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.2515(c). For any performance test required as part of the initial compliance procedures for batch process vents in Table 2 to 40 CFR 63, Subpart FFFF, the Permittee shall submit the test plan required by 40 CFR 63.7(c) and the emission profile with the notification of the performance test.
- (d) Pursuant to 40 CFR 63.2520(c), the Permittee shall submit a pre-compliance report to request approval for any of the items in 40 CFR 63.2520(c)(1) through (7) at least six (6) months prior to the compliance date.
- (e) Pursuant to 40 CFR 63.2520(d), the Permittee shall submit a notification of compliance status report according to the schedule in paragraph (1), and the notification of compliance status report must contain the information specified in paragraph (2).
  - (1) The Permittee shall submit the notification of compliance status report no later than 150 days after the compliance date specified in 40 CFR 63.2445(b).
  - (2) The notification of compliance status report shall include the information in 40 CFR 63.2520(d)(2)(i) through (ix).
- (f) The notifications required by paragraphs (a) through(c) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.6.3 General Standards for 40 CFR 63, Subpart DD [40 CFR 63.683][326 IAC 20-23]

- (a) Pursuant to 40 CFR 63.683(b)(iii), the Permittee shall determine before placing off-site material in off-site material management units that the average volatile organic hazardous air pollutant (VOHAP) concentration of the off-site material is less than 500 parts per million by weight (ppmw) at the point-of-delivery. The Permittee shall review and update this determination at least once every calendar year. If any change in operation increases the average VOHAP concentration of the off-site waste to equal to or greater than 500 ppmw, the Permittee shall comply with all relevant requirements of 40 CFR 63, Subpart DD applicable to off-site material management units.
- (b) Pursuant to 40 CFR 63.683(c)(ii), the Permittee shall determine before placing off-site material in the process equipment associated with the process vent that the average volatile organic hazardous air pollutant (VOHAP) concentration of the off-site material is less than 500 parts per million by weight (ppmw) at the point-of-delivery. The Permittee shall review and update this determination at least once every calendar year. If any change in operation increases the average VOHAP concentration of the off-site waste to equal to or greater than 500 ppmw, the Permittee shall comply with all relevant requirements of 40 CFR 63, Subpart DD applicable to process vents.
- (c) The average VOHAP concentration of the off-site material shall be determined using:
  - (1) The direct measurement approach described in Condition D.6.7(a); or
  - (2) Knowledge of the off-site material as described in Condition D.6.7(b).
- (d) Pursuant to 40 CFR 63.680(c)(3), the total HAP concentration in any pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems shall be less than 10 percent by weight. If any change in operation increase the total HAP concentration to equal to or greater than 10 percent by weight, the Permittee shall comply with the equipment leak requirements of 40 CFR 63, Subpart DD.

D.6.4 Standards Required by 40 CFR 61, Subpart FF [326 IAC 14] [40 CFR 61.342]

- (a) Pursuant to 40 CFR 61.342(a), the total annual benzene quantity from the facility waste shall not exceed 11 tons per year. Compliance with this limit exempts the Permittee from the requirements of 40 CFR 61.342(b) and (c). The total annual benzene from facility waste is defined as the sum of the annual benzene quantity for each waste stream at the facility that has a flow-weighted annual average water content greater than 10 percent or that is mixed with water, or other wastes, at any time and the mixture has an annual average water content greater than 10 percent. The benzene quantity in a waste stream shall be counted only once without multiple counting if other waste streams are mixed with or generated from the original waste stream. The total annual benzene quantity is determined based upon the quantity of benzene in the waste before any waste treatment occurs to remove the benzene.
- (b) Pursuant to 40 CFR 61.342(g), compliance with this subpart will be determined by review of the Permittee's records and results from tests and inspections using methods and procedures specified in D.6.6.

D.6.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

## Compliance Determination Requirements

### D.6.6 Test Methods, Procedures and Compliance Provisions for 40 CFR 61, Subpart FF [326 IAC 14] [40 CFR 61.355]

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- (a) Pursuant to 40 CFR 61.355(a), the Permittee shall determine the total annual benzene quantity from facility waste by the following procedure:
- (1) For each waste stream subject to 40 CFR Part 61, Subpart FF having a flow-weighted annual average water content greater than 10 percent water, on a volume basis as total water, or is mixed with water or other wastes at any time and the resulting mixture has an annual average water content greater than 10 percent as specified in Condition D.6.6(a), the Permittee shall:
    - (A) Determine the annual waste quantity for each waste stream using the procedures specified in Condition D.6.4(a).
    - (B) Determine the flow-weighted annual average benzene concentration for each waste stream using the procedures specified in Condition D.6.4(a).
    - (C) Calculate the annual benzene quantity for each waste stream by multiplying the annual waste quantity of the waste stream times the flow-weighted annual average benzene concentration.

Total annual benzene quantity from facility waste is calculated by adding together the annual benzene quantity for each waste stream generated during the year and the annual benzene quantity for each process unit turnaround waste annualized according to Condition D.6.4(a).
  - (2) If the total annual benzene quantity from facility waste is equal to or greater than 11 ton/yr, then the Permittee shall comply with the requirements of §61.342 (c), (d), or (e).
  - (3) If the total annual benzene quantity from facility waste is less than 11 ton/yr but is equal to or greater than 1.1 ton/yr, then the Permittee shall:
    - (A) Comply with the recordkeeping requirements in Condition D.6.9 and reporting requirements in Condition D.6.10; and
    - (B) Repeat the determination of total annual benzene quantity from facility waste at least once per year and whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 11 ton/yr or more.
  - (4) If the total annual benzene quantity from facility waste is less than 1.1 ton/yr, then the Permittee shall:
    - (A) Comply with the recordkeeping requirements in Condition D.6.9 and reporting requirements in Condition D.6.10.
    - (B) Repeat the determination of total annual benzene quantity from facility waste whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 1.1 ton/yr or more.
  - (5) The benzene quantity in a waste stream that is generated less than one time per year, except as provided for process unit turnaround waste in Condition D.6.4(a), shall be included in the determination of total annual benzene quantity from facility waste for the year in which the waste is generated unless the waste

stream is otherwise excluded from the determination of total annual benzene quantity from facility waste in accordance with Condition D.6.4(a). The benzene quantity in this waste stream shall not be annualized or averaged over the time interval between the activities that resulted in generation of the waste, for purposes of determining the total annual benzene quantity from facility waste.

- (b) Pursuant to 40 CFR 61.355(b) and for purposes of the calculation required by Condition D.6.4(a), the Permittee shall determine the annual waste quantity at the point of waste generation, by one of the following methods:
- (1) Select the highest annual quantity of waste managed from historical records representing the most recent 5 years of operation;
  - (2) Use the maximum design capacity of the waste management unit; or
  - (3) Use measurements that are representative of maximum waste generation rates;
  - (4) The determination of annual waste quantity for each process unit turnaround waste generated only at 2 year or greater intervals, may be made by dividing the total quantity of waste generated during the most recent process unit turnaround by the time period (in the nearest tenth of a year) between the turnaround resulting in generation of the waste and the most recent preceding process turnaround for the unit. The resulting annual waste quantity shall be included in the calculation of the annual benzene quantity as provided in Condition D.6.4(a) of this section for the year in which the turnaround occurs and for each subsequent year until the unit undergoes the next process turnaround. For estimates of total annual benzene quantity as specified in the 90-day report, required under §61.357(a)(1), the Permittee shall estimate the waste quantity generated during the most recent turnaround, and the time period between turnarounds in accordance with good engineering practices. If the Permittee chooses not to annualize process unit turnaround waste, as specified in this paragraph, then the process unit turnaround waste quantity shall be included in the calculation of the annual benzene quantity for the year in which the turnaround occurs.
- (c) Pursuant to 40 CFR 61.355(c) and for the purposes of the calculation required by Condition D.6.4(a), the Permittee shall determine the flow-weighted annual average benzene concentration in a manner that meets the requirements given in Condition D.6.4(a) using either of the methods given in Condition D.6.4(a):
- (1) The determination of flow-weighted annual average benzene concentration shall meet all of the following criteria:
    - (A) The determination shall be made at the point of waste generation except for the process unit turnaround waste. The determination of flow-weighted annual average benzene concentration for process unit turnaround waste shall be made using either of the methods given in Condition D.6.4(a). The resulting flow-weighted annual average benzene concentration shall be included in the calculation of annual benzene quantity as provided in Condition D.6.4(a) for the year in which the turnaround occurs and for each subsequent year until the unit undergoes the next process unit turnaround.
    - (B) Volatilization of the benzene by exposure to air shall not be used in the determination to reduce the benzene concentration.
    - (C) Mixing or diluting the waste stream with other wastes or other materials shall not be used in the determination -- to reduce the benzene concentration.

- (D) The determination shall be made prior to any treatment of the waste that removes benzene, except as specified for process unit turnaround waste in Condition D.6.4(a).
  - (E) For wastes with multiple phases, the determination shall provide the weighted-average benzene concentration based on the benzene concentration in each phase of the waste and the relative proportion of the phases.
- (2) Knowledge of the waste. The Permittee shall provide sufficient information to document the flow-weighted annual average benzene concentration of each waste stream. Examples of information that could constitute knowledge include material balances, records of chemicals purchases, or previous test results provided the results are still relevant to the current waste stream conditions. If test data are used, then the Permittee shall provide documentation describing the testing protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the flow-weighted annual average benzene concentration for the waste stream. When the Permittee and IDEM, OAQ do not agree on determinations of the flow-weighted annual average benzene concentration based on knowledge of the waste, the procedures under Condition D.6.4(a) of this section shall be used to resolve the disagreement.
- (3) Measurements of the benzene concentration in the waste stream in accordance with the following procedures:
- (A) The Permittee shall collect a minimum of three representative samples from each waste stream. Where feasible, samples shall be taken from an enclosed pipe prior to the waste being exposed to the atmosphere.
  - (B) For waste in enclosed pipes, the following procedures shall be used:
    - (i) Samples shall be collected prior to the waste being exposed to the atmosphere in order to minimize the loss of benzene prior to sampling.
    - (ii) A static mixer shall be installed in the process line or in a by-pass line unless the Permittee demonstrates that installation of a static mixer in the line is not necessary to accurately determine the benzene concentration of the waste stream.
    - (iii) The sampling tap shall be located within two pipe diameters of the static mixer outlet.
    - (iv) Prior to the initiation of sampling, sample lines and cooling coil shall be purged with at least four volumes of waste.
    - (v) After purging, the sample flow shall be directed to a sample container and the tip of the sampling tube shall be kept below the surface of the waste during sampling to minimize contact with the atmosphere.
    - (vi) Samples shall be collected at a flow rate such that the cooling coil is able to maintain a waste temperature less than 10 °C (50 °F).
    - (vii) After filling, the sample container shall be capped immediately (within 5 seconds) to leave a minimum headspace in the container.
    - (viii) The sample containers shall immediately be cooled and

maintained at a temperature below 10 C (50 F) for transfer to the laboratory.

- (C) When sampling from an enclosed pipe is not feasible, a minimum of three representative samples shall be collected in a manner to minimize exposure of the sample to the atmosphere and loss of benzene prior to sampling.
- (D) Each waste sample shall be analyzed using one of the following test methods for determining the benzene concentration in a waste stream:
- (i) Method 8020, Aromatic Volatile Organics, in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in §61.18 of 40 CFR Part 61);
  - (ii) Method 8021, Volatile Organic Compounds in Water by Purge and Trap Capillary Column Gas Chromatography with Photoionization and Electrolytic Conductivity Detectors in Series in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in §61.18 of 40 CFR Part 61);
  - (iii) Method 8240, Gas Chromatography/Mass Spectrometry for Volatile Organics in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in §61.18 of 40 CFR Part 61);
  - (iv) Method 8260, Gas Chromatography/Mass Spectrometry for Volatile Organics: Capillary Column Technique in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in §61.18 of 40 CFR Part 61);
  - (v) Method 602, Purgeable Aromatics, as described in 40 CFR part 136, appendix A, Test Procedures for Analysis of Organic Pollutants, for wastewater for which this is an approved EPA methods; or
  - (vi) Method 624, Purgeables, as described in 40 CFR part 136, appendix A, Test Procedures for Analysis of Organic Pollutants, for wastewater for which this is an approved EPA method.
- (E) The flow-weighted annual average benzene concentration shall be calculated by averaging the results of the sample analyses as follows:

$$\bar{C} = \frac{1}{Q_t} \times \sum_{i=1}^n (Q_i)(C_i)$$

Where:

- C = Flow-weighted annual average benzene concentration for waste stream, ppm
- Qt = Total annual waste quantity for waste stream, kg/yr (lb/yr).
- n = Number of waste samples (at least 3).
- Qi = Annual waste quantity for waste stream represented by Ci, kg/yr (lb/yr).
- Ci = Measured concentration of benzene in waste sample i, ppmw.

D.6.7 Testing Methods and Procedures for 40 CFR 63, Subpart DD [326 IAC 20-23] [40 CFR 63.694]

Pursuant to 40 CFR 63.694, the average VOHAP concentration of an off-site material at the point-of-delivery shall be determined using either direct measurement as specified in Condition D.6.7(a) or by knowledge as specified in Condition D.6.7(b).

- (a) Direct measurement to determine VOHAP concentration:
- (1) Sampling. Samples of the off-site material stream shall be collected from the container, pipeline, or other device used to deliver the off-site material stream to the plant site in a manner such that volatilization of organics contained in the sample is minimized and an adequately representative sample is collected and maintained for analysis by the selected method.
    - (A) The averaging period to be used for determining the average VOHAP concentration for the off-site material stream on a mass-weighted average basis shall be designated and recorded. The averaging period can represent any time interval that the owner or operator determines is appropriate for the off-site material stream but shall not exceed 1 year.
    - (B) A sufficient number of samples, but no less than four samples, shall be collected to represent the complete range of HAP compositions and HAP quantities that occur in the off-site material stream during the entire averaging period due to normal variations in the operating conditions for the source or process generating the off-site material stream. Examples of such normal variations are seasonal variations in off-site material quantity or fluctuations in ambient temperature.
    - (C) All samples shall be collected and handled in accordance with written procedures prepared by the owner or operator and documented in a site sampling plan. This plan shall describe the procedure by which representative samples of the off-site material stream are collected such that a minimum loss of organics occurs throughout the sample collection and handling process and by which sample integrity is maintained. A copy of the written sampling plan shall be maintained on-site in the plant site operating records. An example of an acceptable sampling plan includes a plan incorporating sample collection and handling procedures in accordance with the requirements specified in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 or Method 25D in 40 CFR part 60, appendix A.
  - (2) Analysis. Each collected sample must be prepared and analyzed in accordance with one of the following methods as applicable to the sampled off-site material for the purpose of measuring the HAP listed in Table 1 of 40 CFR 63, Subpart DD:
    - (A) Method 305 in 40 CFR part 63, appendix A.
    - (B) Method 25D in 40 CFR part 60, appendix A.
    - (C) Method 624 in 40 CFR part 136, appendix A. If this method is used to analyze one or more compounds that are not on the method's published list of approved compounds, the Alternative Test Procedure specified in 40 CFR 136.4 and 40 CFR 136.5 must be followed.
    - (D) Method 625 in 40 CFR part 136, appendix A. For the purpose of using this method to comply with Subpart DD of 40 CFR 63, the owner or operator must perform corrections to these compounds based on the "accuracy as recovery" using the factors in Table 7 of the method. If this

method is used to analyze one or more compounds that are not on the method's published list of approved compounds, the Alternative Test Procedure specified in 40 CFR 136.4 and 40 CFR 136.5 must be followed.

- (E) Method 1624 in 40 CFR part 136, appendix A.
- (F) Method 1625 in 40 CFR part 136, appendix A.
- (G) Method 8260 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846, Third Edition, September 1986, as amended by Update I, November 15, 1992. As an alternative, an owner or operator may use any more recent, updated version of Method 8260 approved by the EPA. For the purpose of using Method 8260 to comply with this subpart, the owner or operator must maintain a formal quality assurance program consistent with section 8 of Method 8260, and this program must include the following elements related to measuring the concentrations of volatile compounds:
  - (i) Documentation of site-specific procedures to minimize the loss of compounds due to volatilization, biodegradation, reaction, or sorption during the sample collection, storage, and preparation steps.
  - (ii) Documentation of specific quality assurance procedures followed during sampling, sample preparation, sample introduction, and analysis.
  - (iii) Measurement of the average accuracy and precision of the specific procedures, including field duplicates and field spiking of the off-site material source before or during sampling with compounds having similar chemical characteristics to the target analytes.
- (H) Method 8270 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846, Third Edition, September 1986, as amended by Update I, November 15, 1992. As an alternative, an owner or operator may use any more recent, updated version of Method 8270 approved by the EPA. For the purpose of using Method 8270 to comply with this subpart, the owner or operator must maintain a formal quality assurance program consistent with Method 8270, and this program must include the following elements related to measuring the concentrations of volatile compounds:
  - (1) Documentation of site-specific procedures to minimize the loss of compounds due to volatilization, biodegradation, reaction, or sorption during the sample collection, storage, and preparation steps.
  - (2) Documentation of specific quality assurance procedures followed during sampling, sample preparation, sample introduction, and analysis.
  - (3) Measurement of the average accuracy and precision of the specific procedures, including field duplicates and field spiking of the off-site material source before or during sampling with compounds having similar chemical characteristics to the target analytes.
- (I) Any other analysis method that has been validated in accordance with

the procedures specified in section 5.1 and section 5.3 and the corresponding calculations in section 6.1 or section 6.3 of Method 301 in appendix A in 40 CFR part 63. The data are acceptable if they meet the criteria specified in section 6.1.5 or section 6.3.3 of Method 301. If correction is required under section 6.3.3 of Method 301, the data are acceptable if the correction factor is within the range of 0.7 to 1.30. Other sections of Method 301 are not required.

- (3) Calculations. The average VOHAP concentration (C) on a mass-weighted basis shall be calculated by using the results for all samples analyzed in accordance with Condition D.6.7(b)(2) and the equation in 40 CFR 63.694(b)(iii). If the Permittee uses a test method that provides species-specific chemical concentrations, then the Permittee may adjust the measured concentrations to the corresponding concentration values which would be obtained had the off-site material samples been analyzed using Method 305. To adjust these data, the measured concentration for each individual HAP chemical species contained in the off-site material is multiplied by the appropriate species-specific adjustment factor listed in Table 1 of 40 CFR 63.694.
- (b) Knowledge of the off-site material to determine VOHAP concentration:
- (1) Documentation shall be prepared that presents the information used as the basis for the Permittee's knowledge of the off-site material stream's average VOHAP concentration. Examples of information that may be used as the basis for knowledge include: material balances for the source or process generating the off-site material stream; species-specific chemical test data for the off-site material stream from previous testing that are still applicable to the current off-site material stream; previous test data for other locations managing the same type of off-site material stream; or other knowledge based on information in documents such as manifests, shipping papers, or waste certification notices.
  - (2) If test data are used as the basis for knowledge, then the Permittee shall document the test method, sampling protocol, and the means by which sampling variability and analytical variability are accounted for in the determination of the average VOHAP concentration. For example, the Permittee may use HAP concentration test data for the off-site material stream that are validated in accordance with Method 301 in 40 CFR part 63, appendix A as the basis for knowledge of the off-site material.
  - (3) If species-specific chemical concentration test data are used as the basis for knowledge of the off-site material may adjust the test data to the corresponding average VOHAP concentration value which would be obtained had the off-site material samples been analyzed using Method 305. To adjust these data, the measured concentration for each individual HAP chemical species contained in the off-site material is multiplied by the appropriate species-specific adjustment factor (fm305) listed in Table 1 of 40 CFR 63, Subpart DD.
  - (4) In the event that IDEM, OAQ and the Permittee disagree on a determination of the average VOHAP concentration for an off-site material stream using knowledge, then the results from a determination of VOHAP concentration using direct measurement as specified in Condition D.6.7(a) shall be used to establish compliance with the applicable requirements. The IDEM, OAQ may perform or request that the Permittee perform this determination using direct measurement.

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.6.8 Recordkeeping Requirements for 40 CFR 63, Subpart DD**

To demonstrate compliance with Condition D.6.3, the Permittee shall maintain records of the initial and annual determinations of the average VOHAP concentration in off-site waste and the total

HAP content. All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.9 Recordkeeping Requirements for 40 CFR 61, Subpart FF [325 IAC 14] [40 CFR 61.356]

Pursuant to 40 CFR 61.356(b), the Permittee shall maintain the following records:

- (a) Records that identify each waste stream at the facility subject to 40 CFR 61, Subpart FF, and indicate whether or not the waste stream is controlled for benzene emissions in accordance with this subpart.
- (b) For each waste stream not controlled for benzene emissions, the records shall include all test results, measurements, calculations, and other documentation used to determine the following information for the waste stream: waste stream identification, water content, whether or not the waste stream is a process wastewater stream, annual waste quantity, range of benzene concentrations, annual average flow-weighted benzene concentration, and annual benzene quantity.
- (c) For each facility where the annual waste quantity for process unit turnaround waste is determined in accordance with Condition D.6.4(a), the records shall include all test results, measurements, calculations, and other documentation used to determine the following information: identification of each process unit at the facility that undergoes turnarounds, the date of the most recent turnaround for each process unit, identification of each process unit turnaround waste, the water content of each process unit turnaround waste, the annual waste quantity determined in accordance with Condition D.6.6(a), the range of benzene concentrations in the waste, the annual average flow-weighted benzene concentration of the waste, and the annual benzene quantity calculated in accordance with Condition D.6.4(a).
- (d) All records shall be maintained in accordance with Section C – General Recordkeeping Requirements of this permit.

D.6.10 Reporting Requirements for 40 CFR 61, Subpart FF [326 IAC 14] [40 CFR 61.357]

Pursuant to 40 CFR 61.357(b) and (c), the Permittee shall submit the following information to IDEM, OAQ and OES:

- (a) If the total annual benzene quantity from facility waste is less than 1.1 ton/yr, then the Permittee shall submit to IDEM, OAQ and OES a report that updates the information in the initial report (required by 40 CFR 61.357(a)) whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1.1 ton/yr or more.
- (b) If the total annual benzene quantity from facility waste is less than 11 ton/yr but is equal to or greater than 1.1 ton/yr, then the Permittee shall submit to IDEM, OAQ and OES a report that updates the information in the initial report (required by 40 CFR 61.357(a)). The report shall be submitted annually and whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 11 ton/yr or more. If the information from that submitted in the previous annual report is not changed in the following year, the Permittee may submit a statement to that effect.

**SECTION D.7 FACILITY OPERATION CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>			
(e) and (f) Twenty-eight (28) storage tanks subject to 326 IAC 12:			
<b>Plant Location</b>	<b>Tank ID</b>	<b>Storage Capacity (gallons)</b>	<b>Constructed On or Before</b>
Plant 26	2647	10,575	1994
	2650	16,921	1995
	2651	16,921	1995
Plant 27	118	26,227	1989
Plant 29	2969	85,308	1996
Plant 40	305	15,028	1989
	359	21,997	1991
	360	21,997	1991
	366	11,750	1989
	367	11,750	1989
	372	21,997	1994
	373	21,997	1994
Plant 41	11	15,274	1989
	30	15,274	1989
	33	15,274	1997
	35	15,274	1991
	37	15,274	1994
	225	19,858	1996
	235	31,773	1995
Plant 47	2652	12,442	1995
Plant 48	536	11,750	1989
	537	11,750	1997
	538	11,750	1997
Wastewater Treatment Plant (Plant 49)	4927	11,844	1991
	107	16,921	1991
	110	12,796	1991
	CL-101	90,243	1991
	T-101	13,536	1991
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)			

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.7.1 General Provision Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]**

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Kb.

**D.7.2 Standards Required by 40 CFR 60, Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart 60.112b]**

Pursuant to 40 CFR 60.112b(a)(3), storage tank 2969 shall be equipped with a closed vent system and control device meeting the following specifications:

- (a) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, §60.485(b).
- (b) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements §60.18 of the General Provisions.

D.7.3 Compliance Requirements for 40 CFR 60, Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart 60.116b]

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- (a) Pursuant to 40 CFR 60.116b(e), available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.
  - (1) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
  - (2) For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
    - (A) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference in 40 CFR 60.17), unless the IDEM, OAQ specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
    - (B) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 2.0 psia (13.8 kPa) or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 0.5 psia (3.5 kPa).
  - (3) For other liquids, the vapor pressure:
    - (A) May be obtained from standard reference texts, or
    - (B) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference in 40 CFR 60.17); or
    - (C) Measured by an appropriate method approved by the IDEM, OAQ; or
    - (D) Calculated by an appropriate method approved by the IDEM, OAQ.
- (b) Pursuant to 40 CFR 60.116b(f), the Permittee of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements.
  - (1) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in Condition D.7.3(a).
  - (2) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in Condition D.7.2, an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:
    - (A) ASTM D2879-83, 96, or 97 (incorporated by reference in 40 CFR 60.17); or
    - (B) ASTM D323-82 or 94 (incorporated by reference 40 CFR 60.17); or

(C) As measured by an appropriate method as approved by the IDEM, OAQ.

### Compliance Determination Requirements

D.7.4 Testing and Procedures Required by 40 CFR 60, Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart 60.113b]

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Pursuant to 40 CFR 60.113b(c), the Permittee shall comply with the following requirements for storage tank 2969:

Operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Administrator in accordance with §60.113b(c)(1) of this section, unless the plan was modified by the Administrator during the review process. In this case, the modified plan applies.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.5 Reporting and Record Keeping Required by 40 CFR 60, Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart 60.115b and 60.116b]

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- (a) Pursuant to 40 CFR 60.115b(c), the Permittee shall maintain copies of the following records and reports for storage tank 2969:
- (1) A copy of the operating plan.
  - (2) A record of the measured values of the parameters monitored in accordance with §60.113b(c)(2), Condition D.7.4.
- (b) Pursuant to 40 CFR 60.116b(b), the Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for all storage tanks listed in this section. These records shall be kept for the life of the storage tank.
- (c) Pursuant to 40 CFR 60.116b(c), the Permittee shall maintain records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period for the following storage tanks:
- (1) Storage tank CL-101, which have a design capacity greater than 39,890 gallons (151 m<sup>3</sup>) storing a liquid with a maximum true vapor pressure greater than or equal to 0.5 psia (3.5 kPa); and
  - (2) Storage tanks 118, 359, 360, 372, 373, 225, 235, and 797, which have a design capacity greater than or equal to 19,813 gallons (75 m<sup>3</sup>) but less than 39,890 gallons (151 m<sup>3</sup>) storing a liquid with a maximum true vapor pressure greater than or equal to 2.18 psia (15.0 kPa).
- (d) Pursuant to 40 CFR 60.116b(d), for each storage vessel either with a design capacity greater than or equal to 39,890 gallons (151 m<sup>3</sup>) storing a liquid with a maximum true vapor pressure that is normally less than 0.75 psia (5.2 kPa) or with a design capacity greater than or equal to 19,813 gallons (75 m<sup>3</sup>) but less than 39,890 gallons (151 m<sup>3</sup>) storing a liquid with a maximum true vapor pressure that is normally less than 4.0 psia (27.6 kPa) shall notify the IDEM, OAQ within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. The following storage tanks are subject to this requirement CL-101, 118, 359, 360, 372, 373, 225, 235, and 797.

**SECTION D.8 FACILITY OPERATION CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]:</b>			
<b>Insignificant Activities:</b>			
(a) One (1) storage tank, identified as 236, located at Plant 41, having a maximum storage capacity of 32,005 gallons and used to store benzene. This storage tank was constructed 1980.			
(b) One (1) storage tank (identified as tank 254), which has a maximum storage capacity of 19,753 gallons and is used to store benzene. This storage tank was constructed in May 1990 and is located at plant 27.			
(c) The following storage tanks with storage capacities less than 10,000 gallons, which may be used to store benzene:			
<b>Tank Location</b>	<b>Tank ID</b>	<b>Storage Capacity (gallons)</b>	<b>Year Installed</b>
Plant 27	212	6,169	1980
Plant 41	211	6,101	1980
	213	6,101	1980
<b>NA – Construction date unknown.</b>			
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)			

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.8.1 General Provisions Relating to NESHAP [326 IAC 14-1][40 CFR Part 61, Subpart A]**

The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 14-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 61, Subpart Y – National Emission Standard for Benzene Storage Vessels.

**D.8.2 Emission Standard for 40 CFR 61, Subpart Y [326 IAC 14][40 CFR 63, Subpart G] [326 IAC 20-12]**

Pursuant to 40 CFR 61.271(b), storage vessels 254 and 236 shall be equipped with a fixed roof and an internal floating roof.

- (a) An internal floating roof means a cover that rests on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a permanently affixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- (b) The internal floating roof shall be equipped with two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
- (c) Automatic bleeder vents are to be closed at all times when the roof is floating, except when the roof is being floated off or is being landed on the roof leg supports.
- (d) Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

- (e) Each internal floating roof shall meet the specifications listed below.
  - (1) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted.
  - (2) Each penetration of the internal floating roof for the purposes of sampling shall be a sample well. Each sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
  - (3) Each automatic bleeder vent shall be gasketed.
  - (4) Rim space vents shall be equipped with a gasket.
  - (5) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
  - (6) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- (f) Each cover or lid on any opening in the internal floating roof shall be closed (i.e., no visible gaps), except when a device is in actual use. Covers on each access hatch and each automatic gauge float well which are equipped with bolts shall be bolted when they are not in use. Rim space vents are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

D.8.3 Compliance Provisions for 40 CFR 61, Subpart Y [326 IAC 14][40 CFR 63, Subpart G]  
[326 IAC 20-12]

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Pursuant to 40 CFR 61.272, the Permittee shall comply with the following requirements for storage vessels 254 and 236:

- (a) Visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling the storage vessel with benzene. If there are holes, tears or other openings in the primary seal, the secondary seal, or the seal fabric, or defects in the internal floating roof, the Permittee shall repair the items before filling the storage vessel.
- (b) Visually inspect the internal floating roof and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months, except as provided in Condition D.8.3(d)(1). If the internal floating roof is not resting on the surface of the benzene liquid inside the storage vessel, or there is liquid on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, an extension of up to 30 additional days may be requested from the IDEM, OAQ in the inspection report required in Condition D.8.6(a). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will ensure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (c) Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspections as specified in Condition D.8.3(b) and at intervals greater than 5 years in the case of vessels specified in Condition D.8.3(d)(1).

- (1) For all the inspections required by Conditions D.8.3(a) and D.8.3(c), the Permittee shall notify the IDEM, OAQ in writing at least 30 days prior to the refilling of each storage vessel to afford IDEM, OAQ the opportunity to have an observer present. If the inspection required by Condition D.8.3(c) is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the vessel, the Permittee shall notify the IDEM, OAQ at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, the notification including the written documentation may be made in writing and sent by express mail so that it is received by the IDEM, OAQ at least 7 days prior to refilling.
  - (2) If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with benzene.
- (d) For vessels equipped with a double-seal system as specified in Condition D.8.3(c):
- (1) Visually inspect the vessel as specified in Condition D.8.3(c) at least every 5 years; or
  - (2) Visually inspect the vessel annually as specified in Condition D.8.3(b), and at least every 10 years as specified in Condition D.8.3(c).

#### D.8.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for units 254 and 236.

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.8.5 Recordkeeping Requirements [40 CFR 61, Subpart Y] [326 IAC 14][40 CFR 63, Subpart G][326 IAC 20-12]

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Pursuant to 40 CFR 61.276(b), the Permittee shall keep readily accessible records showing the dimensions of each storage vessels and an analysis showing the capacity of each storage vessel for all storage vessels listed in this section. These records shall be kept as long as the storage vessel is in operation. Storage vessels listed in this section which have a design capacity of less than 38 cubic meters (10,000 gallons) are subject to no provisions of 40 CFR 61, Subpart Y other than the requirements specified in this condition.

#### D.8.6 Reporting Requirements [40 CFR 61, Subpart Y] [326 IAC 14][40 CFR 63, Subpart G][326 IAC 20-12]

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Pursuant to 40 CFR 61.275(a), the Permittee shall comply with the following reporting requirements for storage tanks 254 and 236:

- (a) The Permittee shall submit a report describing the results of each inspection conducted in accordance with Condition D.8.3. For vessels for which annual inspections are required under Condition D.8.3(b), the report shall be submitted no more than 12 months after the last report was submitted, and each report is to be submitted within 60 days of each annual inspection.
  - (1) Each report shall include the date of the inspection of the storage vessel and state whether the following conditions exist:

- (A) The internal floating roof is not resting on the surface of the benzene liquid inside the storage vessel, or there is liquid on the roof, or the seal is detached from the internal floating roof, or there are holes, tears or other openings in the seal or seal fabric; or
  - (B) There are visible gaps between the seal and the wall of the storage vessel.
- (2) Where an annual report identifies any condition in Condition D.8.6(a)(1) the annual report shall describe the nature of the defect, the date the storage vessel was emptied, and the nature of an date the repair was made, except as provided in Condition D.8.6(a)(3).
  - (3) If an extension is requested in an annual periodic report in accordance with Condition D.8.3(b), a supplemental periodic report shall be submitted within 15 days of repair. The supplemental periodic report shall identify the vessel and describe the date the storage vessel was emptied and the nature of and date the repair was made.
- (b) The Permittee shall submit a report describing the results of each inspection conducted in accordance with Condition D.8.3(c) and (d).
    - (1) The report is to be submitted within 60 days of conducting each inspection required by Condition D.8.3(c) and (d).
    - (2) Each report shall identify each storage vessel in which the owner or operator finds that the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area. The report shall also describe the nature of the defect, the date the storage vessel was emptied, and the nature of and date the repair was made.

#### D.8.7 Recordkeeping Requirements

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To document compliance with Condition D.8.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

## SECTION D.9

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (j) Plant 27 used to manufacture pyridine and picolines. The plant was initially constructed in 1961 and consists of reactors, a product recovery unit, distillation columns, a drying facility, and two (2) cooling towers. A catalyst regenerator (identified as unit BX27REG), constructed in 1990, is also located in this plant. The catalyst regenerator has emissions of particulate matter that are controlled using an external cyclone (with same ID as the regenerator), which exhausts to stack S-27-006. A molecular sieves regenerator, constructed in 1990, with VOC emissions controlled by a scrubber, is also located at this plant.

### Insignificant Activities:

- (d) Three (3) storage tanks (identified as T-200, T-201, and T-202) located at Plant 27, each with a storage capacity of 51,508 gallons, and used to store formaldehyde. These tanks were constructed in 1992.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.9.1 General Provision Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

- (a) The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subparts F, G, and H.
- (b) The provisions of 40 CFR Part 63, Subpart A- General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 12 to 40 CFR Part 63, Subpart EEEE. The Permittee must comply with these requirements on and after February 3, 2004.
- (c) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

#### D.9.2 National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution, Non-Gasoline - Emission Limitations [40 CFR Part 63, Subpart EEEE]

- (a) The provisions of 40 CFR Part 63, Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution, Non-Gasoline) apply to the affected source, Plant 27.
- (b) Pursuant to 40 CFR 63.2342(b)(1), the Permittee must comply with the emission limitations, operating limits, and work practice standards for existing affected sources no later than February 5, 2007, except as provided in paragraph (b)(2) of 40 CFR 63.2342.
- (c) The Permittee must submit the following notifications according to the schedule in Table 12 to 40 CFR Part 63, Subpart EEEE and as specified in paragraphs (b) through (d) of 40 CFR 63.2382.
- (1) Initial Notification. The Permittee must submit the Initial Notification no later than June 2, 2004.
- (2) The Permittee must submit the Notification of Intent to conduct a performance test at least 60 calendar days before it is initially scheduled to begin as required in

40 CFR 63.7(b)(1).

- (3) Notification of Compliance Status. If the Permittee are required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Table 5, 6, or 7 to 40 CFR Part 63, Subpart EEEE, the Permittee must submit a Notification of Compliance Status. The Notification of Compliance Status must include the information required in 40 CFR Part 63, Section 63.999(b) and in paragraphs (d)(2)(i) through (viii) of 40 CFR 63.2382.
- (e) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.2406, and are applicable to the affected source.

D.9.3 General Standards [40 CFR 63, Subpart G][326 IAC 20-16-1]

Pursuant to 40 CFR 63.102(a), the Permittee of sources subject to 40 CFR Part 63, Subpart F shall comply with the requirements of 40 CFR Part 63, Subparts G and H.

- (a) The provisions set forth in 40 CFR Part 63, Subpart F and Subpart G shall apply at all times except during periods of start-up or shutdown (as defined in 40 CFR 63.101), malfunction, or non-operation of the chemical manufacturing process unit (or specific portion thereof) resulting in cessation of the emissions to which 40 CFR Part 63, Subpart F and Subpart G apply. However, if a start-up, shutdown, malfunction or period of non-operation of one portion of a chemical manufacturing process unit does not affect the ability of a particular emission point to comply with the specific provisions to which it is subject, then that emission point shall still be required to comply with the applicable provisions of 40 CFR Part 63, Subpart F and Subpart G during the start-up, shutdown, malfunction or period of non-operation.
- (b) The provisions set forth in 40 CFR Part 63, Subpart H shall apply at all times except during periods of start-up or shutdown, as defined in 40 CFR 63.101(b), malfunction, process unit shutdown (as defined in 40 CFR 63.161), or non-operation of the chemical manufacturing process unit (or specific portion thereof) in which the lines are drained and depressurized resulting in cessation of the emissions to which 40 CFR Part 63, Subpart H applies.
- (c) The Permittee shall not shut down items of equipment that are required or utilized for compliance with the provisions of 40 CFR Part 63, Subpart F, Subpart G or H during times when emissions (or, where applicable, wastewater streams or residuals) are being routed to such items of equipment, if the shutdown would contravene requirements of 40 CFR Part 63, Subpart F, Subpart G or H applicable to such items of equipment. This condition does not apply if the item of equipment is malfunctioning, or if the Permittee must shut down the equipment to avoid damage due to a contemporaneous start-up, shutdown, or malfunction of the chemical manufacturing process unit or portion thereof.
- (d) During start-ups, shutdowns, and malfunctions when the requirements of 40 CFR Part 63, Subpart F, Subparts G and/or H do not apply pursuant to Conditions D.9.3 (a) through (c), the Permittee shall implement, to the extent reasonably available, measures to prevent or minimize excess emissions to the extent practical. The term "excess emissions" means emissions in excess of those that would have occurred if there were no start-up, shutdown, or malfunction and the Permittee complied with the relevant provisions of 40 CFR Part 63, Subpart F, Subparts G and/or H. The measures to be taken shall be identified in the applicable start-up, shutdown, and malfunction plan, and may include, but are not limited to, air pollution control technologies, recovery technologies, work practices, pollution prevention, monitoring, and/or changes in the manner of operation of the source. Back-up control devices are not required, but may be used if available.

D.9.4 Process Vent Provisions [40 CFR 63, Subpart G][326 IAC 20-16-1]

- (a) Pursuant to 40 CFR 63.113(a), Group 1 process vents (identified as the Box Plant Vent Tank and the DAB Plant Vent Tank) shall comply with the following requirements:
- (1) Emissions of total organic hazardous air pollutants shall not exceed a

concentration of 20 parts per million by volume using process heaters identified as the Box Plant furnace and DAB Plant Furnace, which are both rated at less than 44 megawatts.

- (2) The 20-ppm concentration shall be calculated on a dry basis, and corrected to 3-percent oxygen.
  - (3) Compliance shall be determined by measuring either organic hazardous air pollutants or total organic carbon using the procedures in 40 CFR 116.
- (b) Pursuant to 40 CFR 63.113(b), the vent stream shall be introduced into the flame zone of the Box Plant furnace and DAB Plant Furnace.
- (c) Pursuant to 40 CFR 63.113(e), the Group 2 process vent (identified as the Continuous Stills Vent) shall comply with the following provisions:
- (1) TRE index value shall be maintained at a value greater than 4.0; and
  - (2) The TRE index value shall be calculated using the method in 40 CFR 63.115.

D.9.5 Requirements for Heat Exchange Systems [326 IAC 20] [40 CFR 63, Subpart F]

- (a) Pursuant to 40 CFR 63.104, except when one or more of the conditions specified in 40 CFR 63.104(a)(1) through (a)(6) are met, the Permittee shall monitor each heat exchange system subject to 40 CFR 63.104 according to the provisions in either Condition D.9.5 (b) or (c). Whenever a leak is detected, the Permittee shall comply with the requirements in Condition D.9.5(d).
- (b) If the Permittee elects to comply with the requirements of Condition D.9.5(a) by monitoring the cooling water for the presence of one or more organic hazardous air pollutants or other representative substances whose presence in cooling water indicates a leak, then the Permittee shall comply with the requirements of 40 CFR 63.104(b)(1) through (b)(6). The cooling water shall be monitored for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system.
- (c) If the Permittee elects to comply with the requirement of Condition D.9.5(a) monitoring using a surrogate indicator of heat exchange system leaks, the Permittee shall comply with the requirements specified in 40 CFR 63.104(c)(1) through (c)(3). Surrogate indicators that could be used to develop an acceptable monitoring program are ion specific electrode monitoring, pH, conductivity or other representative indicators.
- (d) If a leak is detected, the Permittee shall comply with the following requirements, except as provided in Condition D.9.5(e).
- (1) The leak shall be repaired as soon as practical but not later than 45 calendar days after the owner or operator receives results of monitoring tests indicating a leak. The leak shall be repaired unless the owner or operator demonstrates that the results are due to a condition other than a leak.
  - (2) Once the leak has been repaired, the owner or operator shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later.
- (e) Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in 40 CFR 63.104(e)(1) or (e)(2) is met. All time periods shall be determined from the date when the Permittee determines that delay of repair is necessary.

D.9.6 Storage Vessel Provisions [326 IAC 20] [40 CFR 63, Subpart G]

Pursuant to 40 CFR 63.123(a), storage tanks T-200, T-201, and T-202, which meet the definition of Group 2 storage vessels as defined in 40 CFR 63.111, are subject to the recordkeeping requirements in Condition D.9.36, but are not subject to any other provisions of 40 CFR 63, Subpart G. If any change causes a storage tank to meet the definition of a Group 1 storage vessel, the Permittee shall comply with all requirements of 40 CFR 63, Subpart G applicable to Group 1 storage tanks.

D.9.7 Process Wastewater Provisions [326 IAC 20] [40 CFR 63, Subpart G]

- (a) The Group 2 wastewater streams (identified as ammonia stripper bottoms and raffinate stripper bottoms) shall comply only with the recordkeeping requirements in 40 CFR 63.147(b)(8).
- (b) If at any time the statements in Condition D.9.7(b) (1) or (2) exist for any wastewater stream located at Plant 27, the Permittee shall comply with the standards, monitoring, recordkeeping and reporting requirements for Group 1 wastewater streams found in 40 CFR 63, Subpart G.
- (1) The total annual average concentration of compounds listed in Table 9 of 40 CFR Part 63, Subpart G is greater than or equal to 10,000 parts per million by weight at any flow rate; or
- (2) The total annual average concentration of compounds listed in Table 9 of 40 CFR Part 63, Subpart G is greater than or equal to 1,000 parts per million by weight and the annual average flow rate is greater than or equal to 10 liters per minute.
- (c) The Permittee shall determine whether a wastewater stream is a Group 1 or Group 2 wastestream in accordance with the provisions in 40 CFR 63.132(c). Total annual average concentration of compounds listed in Table 9 of 40 CFR 63, Subpart G shall be determined according to the procedures specified in 40 CFR 63.144(b). The annual average flow rate shall be determined according to the procedures specified in 40 CFR 63.144(c).
- (d) Pursuant to 40 CFR 63.132(f), the Permittee shall not discard liquid or solid organic materials with a concentration of greater than 10,000 parts per million of compounds listed in Table 9 of 40 CFR Part 63, Subpart G (as determined by analysis of the stream composition, engineering calculations, or process knowledge, according to the provisions of 40 CFR 63.144(b)) from a chemical manufacturing process unit to water or wastewater, unless the receiving stream is managed and treated as a Group 1 wastewater stream. This prohibition does not apply to materials from the following activities:
- (1) Equipment leaks;
- (2) Activities included in maintenance or startup/shutdown/malfunction plans;
- (3) Spills; or
- (4) Samples of a size not greater than reasonably necessary for the method of analysis that is used.

D.9.8 Standards: Pumps in Light Liquid Service [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.163(b)(1), the Permittee shall monitor each pump monthly to detect leaks by the method specified in Condition D.9.24(a) and shall comply with the following requirements, except as provided in 40 CFR 63.162(b) and Condition D.9.8 (d).
- (1) A leak is defined as an instrument reading of 1,000 parts per million or greater.
- (2) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected.

- (b) (1) Pursuant to 40 CFR 63.163(c)(1), when a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition D.9.8(b)(3) or D.9.14.
- (2) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:
- (i) Tightening of packing gland nuts.
- (ii) Ensuring that the seal flush is operating at design pressure and temperature.
- (3) Repair is not required unless an instrument reading of 2,000 parts per million or greater is detected.
- (c) (1) Pursuant to 40 CFR 63.163(d)(1), the Permittee shall calculate percent leaking pumps on a process unit basis.
- (2) If calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak, the Permittee shall implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.175.
- (3) The number of pumps at a process unit shall be the sum of all the pumps in organic HAP service, except that pumps found leaking in a continuous process unit within 1 month after start-up of the pump shall not count in the percent leaking pumps calculation for that one monitoring period only.
- (4) Percent leaking pumps shall be determined by the following equation:
- $$\%PL = ((PL - PS) / (PT - PS)) \times 100$$
- where:  
%PL = Percent leaking pumps
- PL = Number of pumps found leaking as determined through monthly monitoring as required in Condition D.9.8(a).
- PT = Total pumps in organic HAP service, including those meeting the criteria in 40 CFR 63.163(e) and 63.163(f).
- PS = Number of pumps leaking within 1 month of start-up during the current monitoring period.
- (d) Pursuant to 40 CFR 63.163(j), any pump that is designated as an unsafe-to-monitor pump is exempt from the requirements of Condition D.9.8(a) if:
- (1) The Permittee determines that the pump is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with this condition; and
- (2) The Permittee has a written plan that requires monitoring of the pump as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable.

D.9.9 Standards: Pressure Relief Devices In Gas / Vapor Service [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.165(a), except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of less than 500

parts per million above background except as provided in Condition D.9.9(b), as measured by the method specified in Condition D.9.24(b).

- (b) (1) Pursuant to 40 CFR 63.165(b)(1), after each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of less than 500 parts per million above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in Condition D.9.14.
- (2) No later than 5 calendar days after the pressure release and being returned to organic HAP service, the pressure relief device shall be monitored to confirm the condition indicated by an instrument reading of less than 500 parts per million above background, as measured by the method specified in Condition D.9.24(b).
- (c) Pursuant to 40 CFR 63.165(c), any pressure relief device that is routed to a process or fuel gas system or equipped with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device as described in Condition D.9.15 is exempt from the requirements of this condition.

D.9.10 Standards: Open-ended Valves or Lines [326 IAC 14][40 CFR 63, Subpart H]

- (a) Pursuant to 40 CFR 63.167(a)(1), each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and 40 CFR 63.167(d) and 63.167(e). The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair.
- (b) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

D.9.11 Standards: Valves In Gas / Vapor Service and In Light Liquid Service [326 IAC 14][40 CFR 63 Subpart H]

Pursuant to 40 CFR 63.168, valves that are either in gas service or in light liquid service shall comply with the following provisions:

- (a) Pursuant to 40 CFR 63.168(b), the Permittee shall monitor all valves, except as provided in Condition D.9.14 and Conditions D.9.11(f) and D.9.11(g), at the intervals specified in Condition D.9.11(b)
  - (1) The valves shall be monitored to detect leaks by the method specified in Condition D.9.23(a).
  - (2) A leak is defined as an instrument reading of 500 parts per million or greater.
- (b) Pursuant to 40 CFR 63.168(d), the Permittee shall monitor valves for leaks at the intervals specified below:
  - (1) At process units with 2 percent or greater leaking valves, calculated according to Condition D.9.11(c), the Permittee shall either:
    - (i) Monitor each valve once per month; or
    - (ii) Implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175(d) or (e) and monitor quarterly.
  - (2) At process units with less than 2 percent leaking valves, the Permittee shall monitor each valve once each quarter, except as provided in Conditions D.9.11(b)(3) and D.9.11(b)(4).
  - (3) At process units with less than 1 percent leaking valves, the Permittee may elect

to monitor each valve once every 2 quarters.

- (4) At process units with less than 0.5 percent leaking valves, the Permittee may elect to monitor each valve once every 4 quarters.

- (c) Pursuant to 40 CFR 63.168(e)(1), the percent leaking valves at a process unit shall be determined by the following equation:

$$\%VL=(VL/(VT+VC))\times 100$$

where:

%VL = Percent leaking valves as determined through periodic monitoring required in Conditions D.9.11 (a) through (b).

VL = Number of valves found leaking excluding non-repairables as provided in paragraph (c)(2)(i).

VT = Total valves monitored, in a monitoring period excluding valves monitored as required by paragraph (d)(3).

VC = Optional credit for removed valves =  $0.67 \times$  net number (i.e., total removed-total added) of valves in organic HAP service removed from process unit after the date set forth in 40 CFR 63.100(k) of Subpart F for existing process units, and after the date of initial start-up for new sources. If credits are not taken, then VC = 0.

- (1) For use in determining monitoring frequency, the percent leaking valves shall be calculated as a rolling average of two consecutive monitoring periods for monthly, quarterly, or semiannual monitoring programs; and as an average of any three out of four consecutive monitoring periods for annual monitoring programs.

- (2) (i) Non-repairable valves shall be included in the calculation of percent leaking valves the first time the valve is identified as leaking and non-repairable and as required to comply with Condition D.9.11 (c)(2)(ii). Otherwise, a number of non-repairable valves (identified and included in the percent leaking calculation in a previous period) up to a maximum of 1 percent of the total number of valves in organic HAP service at a process unit may be excluded from calculation of percent leaking valves for subsequent monitoring periods.

- (ii) If the number of non-repairable valves exceeds 1 percent of the total number of valves in organic HAP service at a process unit, the number of non-repairable valves exceeding 1 percent of the total number of valves in organic HAP service shall be included in the calculation of percent leaking valves.

- (d) (1) Pursuant to 40 CFR 63.168(f)(1), when a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Condition D.9.14.

- (2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

- (3) When a leak has been repaired, the valve shall be monitored at least once within the first 3 months after its repair.

- (i) The monitoring shall be conducted as specified in Conditions D.9.23(a) and D.9.23(b), as appropriate and as allowed by the rule, to determine whether the valve has resumed leaking.

- (ii) Periodic monitoring required by Condition D.9.11 (a) and (b) may be used to satisfy the requirements of this condition, if the timing of the monitoring period coincides with the time specified in this condition. Alternatively, other monitoring may be performed to satisfy the requirements of this condition, regardless of whether the timing of the monitoring period for periodic monitoring coincides with the specified time.
  - (iii) If a leak is detected, the Permittee shall follow the provisions of the following paragraphs, Conditions D.9.11(d)(3)(iii)(A) and D.9.11(d)(3)(iii)(B), to determine whether that valve must be counted as a leaking valve.
    - (A) If the Permittee elected to use periodic monitoring required by Conditions D.9.11 (a) and (b) to satisfy the requirements of Condition D.9.11(d)(3), then the valve shall be counted as a leaking valve.
    - (B) If the Permittee elected to use other monitoring, prior to the periodic monitoring required by Conditions D.9.11 (a) and (b) to satisfy the requirements of Condition D.9.11 (d)(3), then the valve shall be counted as a leaking valve unless it is repaired and shown by periodic monitoring not to be leaking.
- (e) Pursuant to 40 CFR 63.168(g), first attempts at repair include, but are not limited to, the following practices where practicable:
  - (1) Tightening of bonnet bolts,
  - (2) Replacement of bonnet bolts,
  - (3) Tightening of packing gland nuts, and
  - (4) Injection of lubricant into lubricated packing.
- (f) Pursuant to 40 CFR 63.168(h), any valve that is designated as an unsafe-to-monitor valve is exempt from the requirements of this condition if:
  - (1) The Permittee determines that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with this condition; and
  - (2) The Permittee has a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable.
- (g) Pursuant to 40 CFR 63.168(i), any valve that is designated as a difficult-to-monitor valve is exempt from the requirements of this condition if:
  - (1) The Permittee determines that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner; and
  - (2) The Permittee follows a written plan that requires monitoring of the valve at least once per calendar year.

**D.9.12 Standards: Pumps, Valves, and Connectors in Heavy Liquid Service; Instrumentation Systems; and Pressure Relief Devices in Liquid Service [326 IAC 14][40 CFR 63 Subpart H]**

- (a) Pursuant to 40 CFR 63.169(a), pumps, valves, and connectors in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and instrumentation systems

shall be monitored within 5 calendar days by the method specified in Condition D.9.23(a) if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method. If such a potential leak is repaired as required in Conditions D.9.12(c) and (d), it is not necessary to monitor the system for leaks by the method specified in Condition D.9.23(a).

- (b) Pursuant to 40 CFR 63.169(b), if an instrument reading of 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured, a leak is detected.
- (c)
  - (1) Pursuant to 40 CFR 63.169(c)(1), when a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition D.9.14.
  - (2) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
  - (3) For equipment identified in Condition D.9.12(a) that is not monitored by the method specified in Condition D.9.23(a), repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.
- (d) Pursuant to 40 CFR 63.169(d), first attempts at repair include, but are not limited to, the practices described under Conditions D.9.8(b)(2) and D.9.11(e), for pumps and valves, respectively.

D.9.13 Standards: Surge Control Vessels and Bottoms Receivers [326 IAC 14][40 CFR 63 Subpart H]

Pursuant to 40 CFR 63.170, each surge control vessel or bottoms receiver shall be equipped with a closed-vent system that routes the organic vapors vented from the surge control vessel or bottoms receiver back to the process or to a control device that complies with the requirements in Condition D.9.15, except as provided in 40 CFR 63.162(b), or comply with the requirements of 40 CFR 63.119(b) or 63.119(c) of 40 CFR 63, Subpart G.

D.9.14 Standards: Delay of Repair [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.171(a), delay of repair of equipment for which leaks have been detected is allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur by the end of the next process unit shutdown.
- (b) Pursuant to 40 CFR 63.171(b), delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in organic HAP service.
- (c) Pursuant to 40 CFR 63.171(c), delay of repair for valves, and connectors is also allowed if:
  - (1) The Permittee determines that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair, and
  - (2) When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with Condition D.9.15.
- (d) Pursuant to 40 CFR 63.171(d), delay of repair for pumps is also allowed if:
  - (1) Repair requires replacing the existing seal design with a new system that the Permittee has determined under the provisions of 40 CFR 63.176(d) will provide better performance.

- (2) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
- (e) Pursuant to 40 CFR 63.171(e), delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the second process unit shutdown will not be allowed unless the third process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

D.9.15 Standards: Closed-Vent Systems and Control Devices [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.172(a), closed-vent systems and control devices used to comply with provisions of 40 CFR Part 63, Subpart H shall comply with the provisions of this condition, except as provided in 40 CFR 63.162(b).
- (b) Pursuant to 40 CFR 63.172(b), recovery or recapture devices (e.g., condensers and absorbers) shall be designed and operated to recover the organic hazardous air pollutant emissions or volatile organic compounds emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent.
- (c) Pursuant to 40 CFR 63.172(c), the Permittee shall monitor control devices to ensure that they are operated and maintained in conformance with their design to ensure proper operation and maintenance of the control device.
- (d) Pursuant to 40 CFR 63.172(f), except as provided in Conditions D.9.15 (i) and (j), each closed-vent system shall be inspected according to the procedures and schedule specified below.
  - (1) If the closed-vent system is constructed of hard-piping, the Permittee shall:
    - (i) Conduct an initial inspection according to the procedures Condition D.9.15(e), and
    - (ii) Conduct annual visual inspections for visible, audible, or olfactory indications of leaks.
  - (2) If the vapor collection system or closed-vent system is constructed of ductwork, the Permittee shall:
    - (i) Conduct an initial inspection according to the procedures in Condition D.9.15(e), and
    - (ii) Conduct annual inspections according to the procedures Condition D.9.15(e).
- (e) Pursuant to 40 CFR 63.172(g), each closed-vent system shall be inspected according to the procedures in Condition D.9.23(a).
- (f) Pursuant to 40 CFR 63.172(h), leaks, as indicated by an instrument reading greater than 500 parts per million above background or by visual inspections, shall be repaired as soon as practicable, except as provided in Condition D.9.15(g).
  - (1) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
  - (2) Repair shall be completed no later than 15 calendar days after the leak is detected, except as provided in Condition D.9.15(g).
- (g) Pursuant to 40 CFR 63.172(i), delay of repair of a closed-vent system for which leaks

have been detected is allowed if the repair is technically infeasible without a process unit shutdown or if the Permittee determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown.

- (h) Pursuant to 40 CFR 63.172(j), for each closed-vent system that contains bypass lines that could divert a vent stream away from the control device and to the atmosphere, the Permittee shall comply with the provisions of either Condition D.9.15 (h)(1) or (h)(2), except as provided in Condition D.9.15 (h)(3).
  - (1) Install, set or adjust, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. The flow indicator shall be installed at the entrance to any bypass line; or
  - (2) Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line.
  - (3) Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to Conditions D.9.15 (h)(1) and (h)(2).
- (i) Pursuant to 40 CFR 63.172(k), any parts of the closed-vent system that are designated as unsafe to inspect are exempt from the inspection requirements of Conditions D.9.15 (d)(1) and (d)(2) if:
  - (1) The Permittee determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with Conditions D.9.15 (d)(1) and (d)(2); and
  - (2) The Permittee has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually.
- (j) Pursuant to 40 CFR 63.172(l), any parts of the closed-vent system that are designated as difficult to inspect are exempt from the inspection requirements of Conditions D.9.15 (d)(1) and (d)(2) if:
  - (1) The Permittee determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and
  - (2) The Permittee has a written plan that requires inspection of the equipment at least once every 5 years.
- (k) Pursuant to 40 CFR 63.172(m), whenever organic HAP emissions are vented to a closed-vent system or control device used to comply with the provisions 40 CFR Part 63, Subpart H, such system or control device shall be operating.

D.9.16 Standards: Connectors In Gas / Vapor Service and In Light Liquid Service [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.174(a), the Permittee of a process unit subject to 40 CFR Part 63, Subpart H shall monitor all connectors in gas/vapor and light liquid service, except as provided in 40 CFR 63.162(b), and in Conditions D.9.16(e) and D.9.16(g), at the intervals specified in Condition D.9.16 (b).
  - (1) The connectors shall be monitored to detect leaks by the method specified in Condition D.9.23(a).

- (2) If an instrument reading greater than or equal to 500 parts per million is measured, a leak is detected.
- (b) Pursuant to 40 CFR 63.174(b), the Permittee shall monitor for leaks at the intervals specified in below:
- (1) The Permittee shall monitor all connectors, except as provided in Conditions D.9.16(e) and (g).
  - (2) The Permittee shall perform monitoring of connectors at the frequencies specified in Conditions D.9.16 (b)(2)(i) through (b)(2)(v), except as provided in Condition D.9.16(c)(2):
    - (i) Once per year (i.e., 12-month period), if the percent leaking connectors in the process unit was 0.5 percent or greater during the last required annual or biennial monitoring period.
    - (ii) Once every 2 years, if the percent leaking connectors was less than 0.5 percent during the last required monitoring period. The Permittee may comply with this condition by monitoring at least 40 percent of the connectors in the first year and the remainder of the connectors in the second year. The percent leaking connectors will be calculated for the total of all monitoring performed during the 2-year period.
    - (iii) If the Permittee of a process unit in a biennial leak detection and repair program calculates less than 0.5 percent leaking connectors from the 2-year monitoring period, the Permittee may monitor the connectors one time every 4 years. The Permittee may comply with these requirements by monitoring at least 20 percent of the connectors each year until all connectors have been monitored within 4 years.
    - (iv) If a process unit complying with the requirements of Condition D.9.16 (b) using a 4-year monitoring interval program has greater than or equal to 0.5 percent but less than 1 percent leaking connectors, the Permittee shall increase the monitoring frequency to one time every 2 years. The Permittee may comply with the requirements of this condition by monitoring at least 40 percent of the connectors in the first year and the remainder of the connectors in the second year. The Permittee may elect to use the provisions of Condition D.9.16(b)(2)(iii) when the percent leaking connectors decreases to less than 0.5 percent.
    - (v) If a process unit complying with requirements of Condition D.9.16 (b)(2)(iii) using a 4-year monitoring interval program has 1 percent or greater leaking connectors, the Permittee shall increase the monitoring frequency to one time per year. The Permittee may elect to use the provisions of Condition D.9.16(b)(2)(iii) when the percent leaking connectors decreases to less than 0.5 percent.
- (c) (1) (i) Pursuant to 40 CFR 63.174(c)(1)(i), except as provided in Condition D.9.16 (c)(1)(ii), each connector that has been opened or has otherwise had the seal broken shall be monitored for leaks when it is reconnected or within the first 3 months after being returned to organic hazardous air pollutants service. If the monitoring detects a leak, it shall be repaired according to the provisions of Condition D.9.16 (d), unless it is determined to be non-repairable, in which case it is counted as a non-repairable connector for the purposes of Condition D.9.16 (h)(2).
- (ii) As an alternative to the requirements in Condition D.9.16 (c)(1)(i), the Permittee may choose not to monitor connectors that have been opened

or otherwise had the seal broken. In this case, the Permittee may not count non-repairable connectors for the purposes of Condition D.9.16 (h)(2). The Permittee shall calculate the percent leaking connectors for the monitoring periods described in Condition D.9.16 (b), by setting the non-repairable component, CAN, in the equation in Condition D.9.16 (h)(2) to zero for all monitoring periods.

- (iii) The Permittee may switch alternatives described in Conditions D.9.16 (c)(1)(i) and (c)(1)(ii) at the end of the current monitoring period, provided that it is reported as required in Condition D.9.35 and begin the new alternative in annual monitoring. The initial monitoring in the new alternative shall be completed no later than 12 months after reporting the switch.
- (2) As an alternative to the requirements of Condition D.9.16 (b)(3) of this condition, each screwed connector 2 inches or less in nominal inside diameter may:
  - (i) Comply with the requirements of Condition D.9.12 and
  - (ii) Be monitored for leaks within the first 3 months after being returned to organic hazardous air pollutants service after having been opened or otherwise had the seal broken. If that monitoring detects a leak, it shall be repaired according to the provisions of Condition D.9.16 (d).
- (d) Pursuant to 40 CFR 63.174(d), when a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Condition D.9.16 (f) and in Condition D.9.14. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
- (e) Pursuant to 40 CFR 63.174(f), any connector that is designated as an unsafe-to-monitor connector is exempt from the requirements of Condition D.9.16 (a) if:
  - (1) The Permittee determines that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with Conditions D.9.16 (a) through (d); and
  - (2) The Permittee has a written plan that requires monitoring of the connector as frequently as practicable during safe to monitor periods, but not more frequently than the periodic schedule otherwise applicable.
- (f) Pursuant to 40 CFR 63.174(g), any connector that is designated as an unsafe-to-repair connector is exempt from the requirements of Conditions D.9.16 (a) and (d) if:
  - (1) The Permittee determines that repair personnel would be exposed to an immediate danger as a consequence of complying with Condition D.9.16 (d); and
  - (2) The connector will be repaired before the end of the next scheduled process unit shutdown.
- (g) (1) Pursuant to 40 CFR 63.174(h)(1), any connector that is inaccessible or is ceramic or ceramic-lined (e.g., porcelain, glass, or glass-lined), is exempt from the monitoring requirements of Conditions D.9.16 (a) and (c) and from the recordkeeping and reporting requirements of Conditions D.9.34 and D.9.26. An inaccessible connector is one that is:
  - (i) Buried;
  - (ii) Insulated in a manner that prevents access to the connector by a monitor probe;

- (iii) Obstructed by equipment or piping that prevents access to the connector by a monitor probe;
  - (iv) Unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold which would allow access to connectors up to 7.6 meters (25 feet) above the ground;
  - (v) Inaccessible because it would require elevating the monitoring personnel more than 2 meters above a permanent support surface or would require the erection of scaffold; or
  - (vi) Not able to be accessed at any time in a safe manner to perform monitoring. Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where an ignition potential exists, or access would require near proximity to hazards such as electrical lines, or would risk damage to equipment.
- (2) If any inaccessible or ceramic or ceramic-lined connector is observed by visual, audible, olfactory, or other means to be leaking, the leak shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Condition D.9.14 and D.9.16 (f).
- (3) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
- (h) Pursuant to 40 CFR 63.174(i), for use in determining the monitoring frequency, as specified in Condition D.9.16 (b), the percent leaking connectors shall be calculated as specified below:

$$\% \text{ CL} = [(CL - \text{CAN}) / (\text{Ct} + \text{CC})] \times 100$$

where:

% CL = Percent leaking connectors as determined through periodic monitoring required in Conditions D.9.16(a) and D.9.16(b).

CL = Number of connectors, including non-repairables, measured at 500 parts per million or greater, by the method specified in Condition D.9.23(a).

CAN = Number of allowable non-repairable connectors, as determined by monitoring required in Conditions D.9.16(b)(3) and D.9.16(c), not to exceed 2 percent of the total connector population, Ct.

Ct = Total number of monitored connectors, including non-repairables, in the process unit.

CC = Optional credit for removed connectors =  $0.67 \times$  net number (i.e., total removed—total added) of connectors in organic hazardous air pollutants service removed from the process unit after the compliance date set forth in the applicable subpart for existing process units, and after the date of initial start-up for new process units. If credits are not taken, then CC = 0.

- (i) Pursuant to 40 CFR 63.174(j), if the Permittee eliminates a connector subject to monitoring under Condition D.9.16(b), the Permittee may receive credit for elimination of the connector, as described in Condition D.9.16 (h), provided the following requirements are met.
- (1) The integrity of the weld is demonstrated by monitoring it according to the

procedures in Condition D.9.23(a) or by testing using X-ray, acoustic monitoring, hydrotesting, or other applicable method.

- (2) Welds are monitored or tested within 3 months after being welded.
- (3) If an inadequate weld is found or the connector is not welded completely around the circumference, the connector is not considered a welded connector and is therefore not exempt from the provisions of 40 CFR Part 63, Subpart H.

D.9.17 Requirements for Maintenance Wastewater [326 IAC 20][40 CFR 63, Subpart F]

Pursuant to 40 CFR 63.105, the Permittee shall comply with the requirements of Conditions D.9.17 (a) through (d) for maintenance wastewater containing the organic HAP's listed in Table 9 of 40 CFR 63, Subpart G.

- (a) The Permittee shall prepare a description of maintenance procedures for management of wastewater generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance). The descriptions shall:
  - (1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities.
  - (2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
  - (3) Specify the procedures to be followed when clearing materials from process equipment.
- (b) The Permittee shall modify and update the information required by Condition D.9.17(a) as needed following each maintenance procedure based on the actions taken and the wastewater generated in the preceding maintenance procedure.
- (c) The Permittee shall implement the procedures described in Conditions D.9.17 (a) and (b) as part of the start-up, shutdown, and malfunction plan required under 40 CFR 63.6(e)(3).
- (d) The Permittee shall maintain a record of the information required by Conditions D.9.17 (a) and (b) as part of the start-up, shutdown, and malfunction plan required under 40 CFR 63.6(e)(3).

D.9.18 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the Catalyst Regenerator shall be limited to 0.03 grains per dry standard cubic foot.

D.9.19 VOC Emission Limitation [326 IAC 8-1-6][326 IAC 2-2][OP 900049-01]

The molecular sieves regenerator shall comply with the following limitations:

- (a) The emissions of VOC from the molecular sieves regenerator stack exhaust shall not exceed 0.063 pounds per hour and 0.04 tons per twelve-month period.
- (b) The scrubber used to control emissions from the molecular sieves regenerator shall be in operation at all times the molecular sieves is in operation.
- (c) The number of hours of operation for the molecular sieves shall not exceed 1,350 hours per twelve consecutive month period.

Compliance with these limits make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 not applicable.

D.9.20 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

**Compliance Determination Requirements**

D.9.21 Particulate Control

In order to comply with condition D.9.18, the cyclone used for particulate control shall be in operation and control emissions from the at all times that the Catalyst Regenerator is in operation.

D.9.22 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this Part 70 permit, in order to demonstrate compliance with D.9.19, the Permittee shall perform VOC testing on the molecular sieves regenerator utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.

D.9.23 Monitoring Requirements: Process Vent Provisions [326 IAC 20] [40 CFR 63, Subpart G]

- (a) Pursuant to 40 CFR 63.114(a), the following monitoring equipment is required for process heaters used to comply with the requirements in Condition D.9.4(a)(1): a temperature monitoring device in the firebox equipped with a continuous recorder. This requirement does not apply to gas streams that are introduced with primary fuel or are used as the primary fuel.
- (b) Pursuant to 40 CFR 63.114(d), the Permittee shall comply with Conditions D.9.23 (b)(1) or (b)(2) for any bypass line between the origin of the gas stream (i.e., at an air oxidation reactor, distillation unit, or reactor) and the point where the gas stream reaches the process vent that could divert the gas stream directly to the atmosphere. Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to condition.
  - (1) Properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. Records shall be generated as specified in Condition D.9.36(a). The flow indicator shall be installed at the entrance to any bypass line that could divert the gas stream to the atmosphere; or
  - (2) Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the non-diverting position and the gas stream is not diverted through the bypass line.

D.9.24 Test Methods and Procedures Equipment Leaks [326 IAC 14][40 CFR 63 Subpart H]

Pursuant 40 CFR 63.180(a), the Permittee shall comply with the following test methods and procedures:

- (a) All monitoring shall be performed in accordance with the requirements in 40 CFR 63.180(b).
- (b) Pursuant 40 CFR 63.180(c), when equipment is monitored for compliance as required in 40 CFR 63.164(i), Conditions D.9.9(a), and D.9.15(d) or when equipment subject to a leak definition of 500 ppm is monitored for leaks, the Permittee may elect to adjust or not to adjust the instrument readings for background. If the Permittee elects to not adjust instrument readings for background, the Permittee shall monitor the equipment according to the procedures specified in 40 CFR 63.180(b)(1) through (b)(4). In such case, all instrument readings shall be compared directly to the applicable leak definition to determine whether there is a leak. If the Permittee elects to adjust instrument readings for background, the Permittee shall monitor the equipment according to the procedures specified in 40 CFR 63.180(c)(1) through (c)(4).

- (c) Pursuant 40 CFR 63.180(d)(1), each piece of equipment within a process unit that can reasonably be expected to contain equipment in organic HAP service is presumed to be in organic HAP service unless the Permittee demonstrates that the piece of equipment is not in organic HAP service. For a piece of equipment to be considered not in organic HAP service, it must be determined that the percent organic HAP content can be reasonably expected not to exceed 5 percent by weight on an annual average basis. For purposes of determining the percent organic HAP content of the process fluid that is contained in or contacts equipment, Method 18 of 40 CFR Part 60, Appendix A shall be used.
- (d) The Permittee may use good engineering judgment rather than the procedures in Condition D.9.24 (c) to determine that the percent organic HAP content does not exceed 5 percent by weight. When the Permittee and IDEM, OAQ do not agree on whether a piece of equipment is not in organic HAP service, however, the procedures in paragraph (c) shall be used to resolve the disagreement. Conversely, the Permittee may determine that the organic HAP content of the process fluid does not exceed 5 percent by weight by, for example, accounting for 98 percent of the content and showing that organic HAP is less than 3 percent.
- (e) If the Permittee determines that a piece of equipment is in organic HAP service, the determination can be revised after following the procedures in Condition D.9.24 (c), or by documenting that a change in the process or raw materials no longer causes the equipment to be in organic HAP service.
- (f) Samples used in determining the percent organic HAP content shall be representative of the process fluid that is contained in or contacts the equipment.

#### D.9.25 VOC Control

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In order to comply with D.9.19, the scrubber shall be in operation and control emissions from the dryer at all times that the dryer is in operation.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.9.26 Visible Emissions Notations

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- (a) Visible emission notations of the Catalyst Regenerator stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

#### D.9.27 Cyclone Inspections

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An external inspection shall be performed each calendar quarter of the cyclone controlling the Catalyst Regenerator. Inspections required by this condition shall not be performed in consecutive months.

#### D.9.28 Cyclone Failure Detection

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

#### D.9.29 Monitoring Requirements for the Scrubber

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The Permittee shall monitor the scrubber flow rate at least once per shift for the scrubber controlling the emissions from the molecular sieves regenerator. When for any one reading the flow rate is outside the normal range established from the stack test required by Condition D.9.22, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. The Compliance Response Plan for the scrubbers shall contain troubleshooting contingency and corrective actions for when the flow rate reading is outside of the normal range for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

#### D.9.30 Scrubber Inspections

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An inspection shall be performed each calendar quarter of the scrubber controlling the molecular sieves regenerator.

#### D.9.31 Failure Detection

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In the event that a scrubber malfunction has been observed, the failed scrubber and the associated processes shall be shut down immediately until the scrubber has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.9.32 Record Keeping Requirements

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- (a) To document compliance with Condition D.9.26, the Permittee shall maintain records of visible emission notations of the Catalyst Regenerator stack exhaust once per shift.
- (b) To document compliance with Condition D.9.28 and D.9.31, the Permittee shall maintain records of the results of the inspections required under Condition D.9.28 and D.9.31.
- (c) To document compliance with Condition D.9.20, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with Condition D.9.19, the Permittee shall maintain records of the hours of operation of the drying facility once per shift.
- (e) To document compliance with Condition D.9.30, the Permittee shall maintain records of the flow rate for the scrubber once per shift during normal operation.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.9.33 General Compliance, Reporting, and Recordkeeping provisions [40 CFR 63, Subpart G][326 IAC

20-16-1]

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- (a) Pursuant to 40 CFR 63.103, all records shall be maintained in such a manner that they can be readily accessed. The most recent 6 months of records shall be retained on site or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request. The remaining four and one-half years of records may be retained offsite. Records may be maintained in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.
- (b) The Permittee shall keep records of the following:
- (1) Records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment or of air pollution control equipment or continuous monitoring systems used to comply with 40 CFR Part 63, Subpart F, Subpart G, or H during which excess emissions (as defined in Condition D.9.3(d)) occur.
  - (2) For each start-up, shutdown, and malfunction during which excess emissions (as defined in Condition D.9.3(d)) occur, records that the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. For example, if a start-up, shutdown, and malfunction plan includes procedures for routing a control device to a backup control device (e.g., the incinerator for a halogenated stream could be routed to a flare during periods when the primary control device is out of service), records must be kept of whether the plan was followed. These records may take the form of a "checklist," or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event.
  - (3) For continuous monitoring systems used to comply with 40 CFR Part 63, Subpart G, records documenting the completion of calibration checks and maintenance of continuous monitoring systems that are specified in the manufacturer's instructions or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.
- (c) Pursuant to 40 CFR 63.103(d), all reports required under 40 CFR Part 63, Subparts F, G, and H shall be sent to IDEM, OAQ and US EPA at the addresses listed in 40 CFR 63.13 of Subpart A.

D.9.34 Reporting and Recordkeeping: Process Vent Provisions, Requirements for Group and TRE Determinations and Performance Tests [326 IAC 20] [40 CFR 63, Subpart G]

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- (a) Pursuant to 40 CFR 63.117(a), the Permittee shall keep an up-to-date, readily accessible record of the data specified in 40 CFR 63.117 (a)(1) through (a)(3), as applicable, and if any subsequent TRE determinations or performance tests are conducted, report the data in specified in 40 CFR 63.117 (a)(1) through (a)(3) in the next Periodic Report.
- Record and report the following when using a combustion device to achieve an organic HAP concentration of 20 parts per million by volume, as specified in Condition D.9.4(a)(1):
- (1) A description of the location at which the vent stream is introduced into the process heater.
  - (2) The concentration of organic HAP or TOC (parts per million by volume, by compound) determined as specified in 40 CFR 63.116 at the outlet of the combustion device on a dry basis corrected to 3 percent oxygen.
- (b) Pursuant to 40 CFR 63.117(b), the Permittee of a Group 2 process vent with a TRE index greater than 4.0 as specified in Condition D.9.4(c), shall maintain records of measurements, engineering assessments, and calculations performed to determine the TRE index value of the vent stream. Documentation of engineering assessments shall

include all data, assumptions, and procedures used for the engineering assessments.

D.9.35 Reporting and Recordkeeping: Process Vent Provisions - Periodic Requirements [326 IAC 20] [40 CFR 63, Subpart G]

- (a) For process vents subject to the requirements of 40 CFR 63, Subpart G, the Permittee shall keep up-to-date and readily accessible records of the information specified in 40 CFR 63.118(a).
- (b) For the Group 2 process vent complying with Condition D.9.4(c), the Permittee shall keep up-to-date, readily accessible records of information specified in 40 CFR 63.118(c).
- (c) For Group 1 process vents, the Permittee shall submit to IDEM, OAQ Periodic Reports as specified in 40 CFR 63.118(f).
- (d) Pursuant to 40 CFR 63.118(g), whenever a process change is made that causes a Group 2 process vent to become a Group 1 process vent, the Permittee shall submit a report within 180 calendar days after the process change as specified in 40 CFR 63.151(j). The report shall include:
  - (1) A description of the process change;
  - (2) The results of the recalculation of the flow rate, organic HAP concentration, and TRE index value required under 40 CFR 63.115(e); and
  - (3) A statement that the Permittee will comply with the provisions of 40 CFR 63, Subpart G for Group 1 process vents.
- (e) Pursuant to 40 CFR 63.118(h), whenever a process change is made that causes a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0, the Permittee shall submit a report within 180 calendar days after the process change. The report may be submitted as part of the next periodic report. The report shall include:
  - (1) A description of the process change,
  - (2) The results of the recalculation of the TRE index value required under 40 CFR 63.115(e), and
  - (3) A statement that the Permittee will comply with the requirements specified in 40 CFR 63.113(d).
- (f) The Permittee is not required to submit a report of a process change if one of the conditions listed in 40 CFR 63.118(k) is met.

D.9.36 Process Wastewater Provisions – Recordkeeping [326 IAC 20] [40 CFR 63, Subpart G]

- (a) Pursuant to 40 CFR 63.147(b), the Permittee shall keep in a readily accessible location the following records:
  - (1) Process unit identification and description of the process unit.
  - (2) Stream identification code.
  - (3) Concentration of compounds listed in Table 9 of 40 CFR Part 63, Subpart G in parts per million, by weight. Include documentation of the methodology used to determine concentration.
  - (4) Flow rate in liter per minute.
- (b) Pursuant to 40 CFR 63.147(f), if the Permittee uses process knowledge to determine the annual average concentration of a wastewater stream as specified in 40 CFR

63.144(b)(1) and/or uses process knowledge to determine the annual average flow rate as specified in 40 CFR 63.144(c)(1), and determines that the wastewater stream is not a Group 1 wastewater stream, the Permittee shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream.

D.9.37 General Reporting [326 IAC 20] [40 CFR 63, Subpart G]

- (a) The Permittee submit Periodic Reports in accordance with the requirements of 40 CFR 63.152(c).
- (b) The Permittee shall submit additional reports in accordance with the requirements of 40 CFR 63.152(d), including reports of start-up, shutdown, and malfunction.

D.9.38 Recordkeeping Requirements for Equipment Leaks [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.181(a), all records shall be maintained in a manner that can be readily accessed at the plant site. This could include physically locating the records at the plant site or accessing the records from a central location by computer at the plant site.
- (b) The Permittee shall maintain records of the information required by 40 CFR 63.181(b).
- (c) Pursuant to 40 CFR 63.181(c), for visual inspections of equipment subject to the provisions of 40 CFR Part 63, Subpart H, the Permittee shall document that the inspection was conducted and the date of the inspection. The Permittee shall maintain records as specified in Condition D.9.39(d) for leaking equipment identified in this inspection. These records shall be retained for 2 years.
- (d) When each leak is detected as specified in Conditions D.9.8, D.9.11, D.9.12, D.9.15, and D.9.16, the Permittee shall maintain copies of the records specified in 40 CFR 63.181(d). The information shall be recorded and kept for 2 years.
- (e) Pursuant to 40 CFR 63.181(f), the dates and results of the monitoring following a pressure release for each pressure relief device subject to the provisions in Conditions D.9.9(a) and D.9.9(b). The results shall include:
  - (1) The background level measured during each compliance test.
  - (2) The maximum instrument reading measured at each piece of equipment during each compliance test.
- (f) The Permittee shall maintain records of the information specified in 40 CFR 63.181(g) for closed-vent systems and control devices subject to the provisions of Condition D.9.15.
- (g) For vents or pumps subject to the requirements of 40 CFR 63.175 and 40 CFR 63.176, the Permittee shall maintain the records specified in Pursuant to 40 CFR 63.181(h) for the period of the quality improvement program for the process unit.

D.9.39 Reporting requirements for Equipment Leaks [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.182(d), the Permittee shall submit Periodic Reports.
  - (1) A report containing the information in Conditions D.9.40 (a)(2), (a)(3), and (a)(4) shall be submitted semiannually as required in 40 CFR 63.182(c).
  - (2) For each process unit complying with the provisions of 40 CFR 63, Subpart H, the summary information listed below for each monitoring period during the 6-month period.
    - (i) The number of valves for which leaks were detected as described in Condition D.9.11(a), the percent leakers, and the total number of valves monitored;

- (ii) The number of valves for which leaks were not repaired as required in Condition D.9.11(d), identifying the number of those that are determined non-repairable;
  - (iii) The number of pumps for which leaks were detected as described in Condition D.9.8(a), the percent leakers, and the total number of pumps monitored;
  - (iv) The number of pumps for which leaks were not repaired as required in Condition D.9.8(b);
  - (v) The number of connectors for which leaks were detected as described in Condition D.9.16(a), the percent of connectors leaking, and the total number of connectors monitored;
  - (vi) The number of connectors for which leaks were not repaired as required in Condition D.9.16(d), identifying the number of those that are determined non-repairable;
  - (vii) The facts that explain any delay of repairs and, where appropriate, why a process unit shutdown was technically infeasible.
  - (viii) The results of all monitoring to show compliance with Conditions D.9.9(a), D.9.15(d), and 40 CFR 63.164(i) conducted within the semiannual reporting period.
  - (ix) If applicable, the initiation of a monthly monitoring program under Condition D.9.11(b)(1)(i), or a quality improvement program under either 40 CFR 63.175 or 63.176.
  - (x) If applicable, notification of a change in connector monitoring alternatives as described in Condition D.9.16(c)(1).
- (3) Any revisions to items reported in earlier Notification of Compliance Status, if the method of compliance has changed since the last report.

D.9.40 Recordkeeping Requirements for Storage Vessels [326 IAC 20] [40 CFR 63, Subpart G]

Pursuant to 40 CFR 63.123(a), the Permittee shall keep readily accessible records showing the dimensions and an analysis showing the capacity of each Group 2 storage vessel (identified as T-200, T-201, and T-202). This record shall be kept as long as the storage vessel retains Group 2 status and is in operation.

D.9.41 Recordkeeping and Reporting Requirements for Heat Exchange Systems [326 IAC 20] [40 CFR 63, Subpart F]

- (a) Pursuant to 40 CFR 63.104(f)(1), the Permittee shall retain the following records:
- (1) Monitoring data required by this section indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;
  - (2) Records of any leaks detected by procedures subject to Condition D.9.5 and the date the leak was discovered;
  - (3) The dates of efforts to repair leaks; and
  - (4) The method or procedure used to confirm repair of a leak and the date repair was confirmed.

- (b) Pursuant to 40 CFR 63.104(f)(2), if the Permittee invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported.
- (1) The Permittee shall report the presence of the leak and the date that the leak was detected.
  - (2) The Permittee shall report whether or not the leak has been repaired.
  - (3) The Permittee shall report the reason(s) for delay of repair. If delay of repair is invoked due to the reasons described in 40 CFR 63.104(e)(2), documentation of emissions estimates shall also be submitted.
  - (4) If the leak remains unrepaired, the Permittee shall report the expected date of repair.
  - (5) If the leak is repaired, the Permittee shall report the date the leak was successfully repaired.

D.9.42 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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The Permittee shall submit a applications for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit. For compliance with 40 CFR 63, Subpart EEEE:

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart EEEE, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than May 5, 2006.
- (c) The significant permit modification applications shall be submitted to:

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

and

City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

## SECTION D.10

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (n) Plant 40 is used to dehydrate 2-picolinic acid and 4-picolinic acid with caustic to produce vinyl pyridine. The plant was initially constructed in 1969. Plant 40 consists of the following process units: reactor, separation, distillation, and vent tank. Emissions are vented through six vents identified as follows:
- (1) Column #3 Atmospheric Vent (S/V 40/001) used to vent emissions from the separation facilities;
  - (2) Receiver Atmospheric Vents (S/V 40-002A, 40-002B, and 40-002C) used to vent emissions from the distillation facilities;
  - (3) Still Atmospheric Vent (S/V 40-002C) used to vent emissions from the distillation facilities; and
  - (4) Vent tank (S/V 40-004) used to vent emissions from Columns 1, 2, and 4.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.10.1 General Provision Relating to NESHAPs [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14, apply to the facility described in this section except when otherwise specified in 40 CFR 61, Subpart J - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene.

#### D.10.2 Standards for 40 CFR 61, Subpart J [40 CFR 61.111][326 IAC 14]

Pursuant to 40 CFR 61.112, the Permittee shall comply with the requirements of 40 CFR 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) for equipment in benzene service, including affected pumps; open-ended valves; open-ended lines; valves; and connectors.

#### D.10.3 General Standards for 40 CFR 61, Subpart V [60 CFR 61.242-1] [40 CFR 61, Subpart J] [326 IAC 14]

Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.242-1, the Permittee shall comply with the following requirements:

- (a) Each piece of equipment to which 40 CFR 61, Subparts J and V apply shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.
- (b) Equipment that is in vacuum service is excluded from the requirements of Conditions D.10.4 through D.10.7 if it is identified as required in Condition D.10.9(d)(4).
- (c) The definitions in 40 CFR 61, Subpart J, Section 61.111 are applicable to the Permittee.

#### D.10.4 Standards: Pumps [40 CFR 61.242-2] [40 CFR 61, Subpart J] [326 IAC 14]

Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.242-2, pumps subject to the requirements of 40 CFR 61, Subpart J shall comply with the following requirements:

- (a)
  - (1) Each pump shall be monitored monthly to detect leaks by the methods specified in Condition D.10.8(a), except as provided in Conditions D.10.4(d), (e), and (f).
  - (2) Each pump shall be checked by visual inspection each calendar week for

indications of liquids dripping from the pump seal.

- (b)
  - (1) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
  - (2) If there are indications of liquids dripping from the pump seal, a leak is detected.
- (c)
  - (1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition D.10.7.
  - (2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (d) Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of Conditions D.10.4(a) and (b), provided the following requirements are met:
  - (1) Each dual mechanical seal system is:
    - (A) Operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or
    - (B) Equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system; or
    - (C) Equipped with a system that purges the barrier fluid into a process stream with zero VHAP emissions to atmosphere.
  - (2) The barrier fluid is not in VHAP service and, if the pump is covered by standards under 40 CFR part 60, is not in VOC service.
  - (3) Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.
  - (4) Each pump is checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
    - (A) If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, the pump shall be monitored as specified in Condition D.10.8 to determine the presence of VOC and VHAP in the barrier fluid.
    - (B) If the monitor reading (taking into account any background readings) indicates the presence of VHAP, a leak is detected. For the purpose of this paragraph, the monitor may be calibrated with VHAP, or may employ a gas chromatography column to limit the response of the monitor to VHAP, at the option of the Permittee.
    - (C) If an instrument reading of 10,000 ppm or greater (total VOC) is measured, a leak is detected.
  - (5) Each sensor as described in Condition D.10.4(d)(3) is checked daily or is equipped with an audible alarm.
  - (6)
    - (A) The Permittee determines, based on design considerations and operating experience, criteria applicable to the presence and frequency of drips and to the sensor that indicates failure of the seal system, the barrier fluid system, or both.
    - (B) If indications of liquids dripping from the pump seal exceed the criteria established in Condition D.10.4(d)(6)(A), or if, based on the criteria

established in Condition D.10.4(d)(6)(A), the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.

- (C) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after it is detected, except as provided in Condition D.10.7.
  - (D) A first attempt at repair shall be made no later than five calendar days after each leak is detected.
- (e) Any pump that is designated, as described in Condition D.10.9(d)(2)(A), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of Condition D.10.4(a), (c), and (d) if the pump:
- (1) Has no externally actuated shaft penetrating the pump housing,
  - (2) Is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in Condition D.10.8(b), and
  - (3) Is tested for compliance with Condition D.10.4(e)(2) initially upon designation, annually, and at other times requested by the Administrator.
- (f) Any pump that is designated, as described in Condition D.10.9(e)(1), as an unsafe-to-monitor pump is exempt from the monitoring and inspection requirements of Condition D.10.4(a) and (d)(4) through (d)(6) if:
- (1) The Permittee demonstrates that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with Condition D.10.4(a); and
  - (2) The Permittee has a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in Condition D.10.4(c) if a leak is detected.
- (g) Any pump that is located within the boundary of an unmanned plant site is exempt from the weekly visual inspection requirement of Condition D.10.4(a)(2) and (d)(4), and the daily requirements of Condition D.10.4(d)(5), provided that each pump is visually inspected as often as practicable and at least monthly.

D.10.5 Standards: Open-ended Valves or Lines [40 CFR 61.242-6] [40 CFR 61, Subpart J] [326 IAC 14]

Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.242-6, open-ended valves and lines subject to the requirements of 40 CFR 61, Subpart J shall comply with the following requirements:

- (a)
  - (1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve.
  - (2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.
- (b) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
- (c) When a double block and bleed system is being used, the bleed valve or line may remain

open during operations that require venting the line between the block valves but shall comply with Condition D.10.5(a) at all other times.

- (d) Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of Condition D.10.5(a), (b) and (c).
- (e) Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in Condition D.10.5(a) through (c) are exempt from the requirements of Condition D.10.5(a) through (c).

D.10.6 Standards: Valves [40 CFR 61.242-7] [40 CFR 61, Subpart J] [326 IAC 14]

Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.242-7, valves subject to the requirements of 40 CFR 61, Subpart J shall comply with the following requirements:

- (a) Each valve shall be monitored monthly to detect leaks by the method specified in Condition D.10.8(a) and shall comply with Conditions D.10.6(b) through (e), except as provided in Conditions D.10.6(f), (g), and (h).
- (b) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
- (c)
  - (1) Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected.
  - (2) If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.
- (d)
  - (1) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Condition D.10.7.
  - (2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (e) First attempts at repair include, but are not limited to, the following best practices where practicable:
  - (1) Tightening of bonnet bolts;
  - (2) Replacement of bonnet bolts;
  - (3) Tightening of packing gland nuts; and
  - (4) Injection of lubricant into lubricated packing.
- (f) Any valve that is designated, as described in Condition D.10.9(d)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of Condition D.10.6(a) if the valve:
  - (1) Has no external actuating mechanism in contact with the process fluid;
  - (2) Is operated with emissions less than 500 ppm above background, as measured by the method specified in Condition D.10.8(b); and
  - (3) Is tested for compliance with Condition D.10.6(f)(2) initially upon designation, annually, and at other times requested by the Administrator.
- (g) Any valve that is designated, as described in Condition D.10.9(e)(1), as an unsafe-to-monitor valve is exempt from the requirements of Condition D.10.6(a) if:

- (1) The Permittee of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with Condition D.10.6(a); and
  - (2) The Permittee of the valve has a written plan that requires monitoring of the valve as frequent as practicable during safe-to-monitor times.
- (h) Any valve that is designated, as described in Condition D.10.9(e)(2), as a difficult-to-monitor valve is exempt from the requirements of Condition D.10.6(a) if:
- (1) The Permittee of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface;
  - (2) The process unit within which the valve is located is an existing process unit; and
  - (3) The Permittee of the valve follows a written plan that requires monitoring of the valve at least once per calendar year.

**D.10.7 Standards: Delay of Repair [40 CFR 61.242-10] [40 CFR 61, Subpart J] [326 IAC 14]**

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Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.242-10, the Permittee shall comply with the following requirements:

- (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.
- (b) Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the process and that does not remain in VHAP service.
- (c) Delay of repair for valves will be allowed if:
  - (1) The Permittee demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
  - (2) When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with 40 CFR 61.242-11.
- (d) Delay of repair for pumps will be allowed if:
  - (1) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
  - (2) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
- (e) Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

**Compliance Determination Requirements**

**D.10.8 Test Methods and Procedures [40 CFR 61.245] [40 CFR 61, Subpart J] [326 IAC 14]**

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Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.245, the Permittee shall comply with the

following test methods and procedures:

- (a) Monitoring, as required in Conditions D.10.3 through D.10.7, shall comply with the following requirements:
  - (1) Monitoring shall comply with Method 21 of Appendix A of 40 CFR Part 60.
  - (2) The detection instrument shall meet the performance criteria of Method 21.
  - (3) The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21.
  - (4) Calibration gases shall be:
    - (A) Zero air (less than 10 ppm of hydrocarbon in air); and
    - (B) A mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm methane or n-hexane.
  - (5) The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21.
- (b) When equipment is tested for compliance with or monitored for no detectable emissions, the Permittee shall comply with the following requirements:
  - (1) The requirements of Conditions D.10.8(a)(1) through (a)(4) shall apply.
  - (2) The background level shall be determined, as set forth in Method 21.
  - (3) The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21.
  - (4) The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm for determining compliance.
- (c)
  - (1) Each piece of equipment within a process unit that can conceivably contain equipment in VHAP service is presumed to be in VHAP service unless the Permittee demonstrates that the piece of equipment is not in VHAP service. For a piece of equipment to be considered not in VHAP service, it shall be determined that the percent VHAP content can be reasonably expected never to exceed 10 percent by weight. For purposes of determining the percent VHAP content of the process fluid that is contained in or contacts equipment, procedures that conform to the methods described in ASTM Method D-2267 (incorporated by the reference as specified in 40 CFR 61.18) shall be used.
    - (2)
      - (A) The Permittee may use engineering judgment rather than the procedures in Condition D.10.8(c)(1) to demonstrate that the percent VHAP content does not exceed 10 percent by weight, provided that the engineering judgment demonstrates that the VHAP content clearly does not exceed 10 percent by weight. When a Permittee and the Administrator do not agree on whether a piece of equipment is not in VHAP service, however, the procedures in Condition D.10.8(c)(1) shall be used to resolve the disagreement.
      - (B) If a Permittee determines that a piece of equipment is in VHAP service, the determination can be revised only after following the procedures in Condition D.10.8(c)(1).
    - (3) Samples used in determining the percent VHAP content shall be representative of

the process fluid that is contained in or contacts the equipment.

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.10.9 Recordkeeping Requirements [40 CFR 61.246] [40 CFR 61, Subpart J] [326 IAC 14]

Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.246, the Permittee shall comply with the following recordkeeping requirements:

- (a) The Permittee may comply with the recordkeeping requirements for process units subject to 40 CFR 61, Subparts J and V in one recordkeeping system if the system identifies each record by each process unit.
- (b) When each leak is detected as specified in Conditions D.10.4 and D.10.6, the following requirements apply:
  - (1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
  - (2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in Condition D.10.6(c) and no leak has been detected during those 2 months.
  - (3) The identification on equipment, except on a valve may be removed after it has been repaired.
- (c) When each leak is detected as specified in Conditions D.10.4 and D.10.6, the following information shall be recorded in a log and shall be maintained on site in a readily accessible location:
  - (1) The instrument and operator identification numbers and the equipment identification number.
  - (2) The date the leak was detected and the dates of each attempt to repair the leak.
  - (3) Repair methods applied in each attempt to repair the leak.
  - (4) "Above 10,000" if the maximum instrument reading measured by the methods specified in Condition D.10.8(a) after each repair attempt is equal to or greater than 10,000 ppm.
  - (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
  - (6) The signature of the Permittee (or designate) whose decision it was that repair could not be effected without a process shutdown.
  - (7) The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days.
  - (8) Dates of process unit shutdowns that occur while the equipment is unrepaired.
  - (9) The date of successful repair of the leak.
- (d) The following information pertaining to all equipment to which a standard applies shall be recorded in a log that is kept in a readily accessible location:
  - (1) A list of identification numbers for equipment (except welded fittings) subject to the requirements of this subpart.
  - (2) (A) A list of identification numbers for equipment that the Permittee elects to

- designate for no detectable emissions as indicated by an instrument reading of less than 500 ppm above background.
- (B) The designation of this equipment for no detectable emissions shall be signed by the Permittee.
- (3)
    - (A) The dates of each compliance test required in Conditions D.10.4(e) and D.10.6(f).
    - (B) The background level measured during each compliance test.
    - (C) The maximum instrument reading measured at the equipment during each compliance test.
  - (4) A list of identification numbers for equipment in vacuum service.
- (e) The following information pertaining to all valves subject to the requirements of Conditions D.10.6(g) and (h) and to all pumps subject to the requirements of Condition D.10.4(f) shall be recorded in a log that is kept in a readily accessible location:
- (1) A list of identification numbers for valves and pumps that are designated as unsafe to monitor, an explanation for each valve or pump stating why the valve or pump is unsafe to monitor, and the plan for monitoring each valve or pump.
  - (2) A list of identification numbers for valves that are designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the planned schedule for monitoring each valve.
- (f) The following information shall be recorded in a log that is kept in a readily accessible location:
- (1) Design criterion required in Condition D.10.4(d)(5) and an explanation of the design criterion; and
  - (2) Any changes to this criterion and the reasons for the changes.
- (g) The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in the applicability section of this subpart and other specific subparts:
- (1) An analysis demonstrating the design capacity of the process unit, and
  - (2) An analysis demonstrating that equipment is not in VHAP service.
- (h) Information and data used to demonstrate that a piece of equipment is not in VHAP service shall be recorded in a log that is kept in a readily accessible location.

D.10.10 Reporting Requirements [40 CFR 61.247] [40 CFR 61, Subpart J] [326 IAC 14]

Pursuant to 40 CFR 61, Subpart J and 40 CFR 60.247, the Permittee shall comply with the following reporting requirements:

- (a) The Permittee shall submit a semiannual report to the IDEM, OAQ. The report shall include the following information:
  - (1) Process unit identification.
  - (2) For each month during the semiannual reporting period,
    - (A) Number of valves for which leaks were detected as described in

Condition D.10.6(b).

- (B) Number of valves for which leaks were not repaired as required in Condition D.10.6(d).
  - (C) Number of pumps for which leaks were detected as described in Conditions D.10.4(b) and (d)(6).
  - (D) Number of pumps for which leaks were not repaired as required in Condition D.10.4(c) and (d)(6).
  - (E) The facts that explain any delay of repairs and, where appropriate, why a process unit shutdown was technically infeasible.
- (3) Dates of process unit shutdowns which occurred within the semiannual reporting period.
  - (4) Revisions to items reported in the initial report required by 40 CFR 61.247(a) if changes have occurred since the initial report or subsequent revisions to the initial report were submitted. Note: Compliance with the requirements of 40 CFR 61.10(c) is not required for revisions documented under this Condition.
  - (5) The results of all performance tests and monitoring to determine compliance with no detectable emissions conducted within the semiannual reporting period.
- (b) Pursuant to 40 CFR 61.247(c), the semiannual reports shall be submitted according to the reporting schedule specified in the initial report, unless a revised schedule has been submitted in a subsequent semiannual report.
  - (c) An application for approval of construction or modification under 40 CFR 61.05(a) and 61.07 shall not be required provided:
    - (1) The new source complies with the standards in 40 CFR 61.242;
    - (2) The new source is not part of the construction of a process unit; and
    - (3) In the next semiannual report required by Condition D.10.10(a), the information in 40 CFR 61.247(a)(5) is reported.

**SECTION D.11**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]**

- (o) Plant 47, used to manufacture a variety of specialty chemicals. The plant was initially constructed in 1979 and consists of the following facilities:
  - (1) Reactor, controlled by a scrubber
  - (2) Distillation
  - (3) Separation
  - (4) One (1) 0.4 MMBtu per hour waste gas flare (identified as unit HC47GFS), used to control emissions from Plant 47. This unit was installed in 1979 and exhausts to stack S-47-001.
- (p) Plant 48, used to manufacture a variety of specialty chemicals. The plant was initially constructed in 1972 and consists of reactors (with emissions controlled by a scrubber) and distillation facilities.

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

There are no requirements applicable to these units.

## SECTION D.12

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (k) Plant 38 used to manufacture precursors to various grades of vitamin B-3. The plant was initially constructed in 1967 and consists of the following emission units:
- (1) Reactors;
  - (2) Separators;
  - (3) An evaporator with emissions controlled by a scrubber;
  - (4) One (1) packaging facility consisting of the following:
    - (A) one (1) mill (identified as 28-MB), with non-vented pneumatic conveying system,
    - (B) One (1) pneumatic conveying system identified as Vacuum Receiver 28-VR (known as the hurricane blower) installed in 1997, with a maximum operating capacity of 6,750 pounds per hour. This unit exhausts at stack S-28-002.
    - (C) One pick-up collector (known as central vac), installed in 1997, with a maximum operating capacity of 150 pounds per hour. This unit exhausts at stack S-28-003.
- And controlled by the following two (2) baghouses:
- (A) Micro Pul (known as the downstairs collector), installed in 1991, with a maximum operating capacity of 670 pounds per hour, exhausting at stack S-28-004, and
  - (B) Penthouse collector (known as the MAC dust collector), installed in 2000, with a maximum operating capacity of 1,500 pounds per hour, exhausting at stack S-28-001.
- (l) Plant 41 used to manufacture pyridine and picoline derivatives and picolines. The plant was initially constructed in 1968. Plant 41 consists of the following facilities:
- (1) Reactor
  - (2) Separation facility with emissions controlled using one (1) 8.0 MMBtu per hour waste gas incinerator (identified as unit CP41GCS), which exhausts to stack S-41-001 or S-29-001.
  - (3) Distillation

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.12.1 General Provisions Relating to NESHAP [326 IAC 20][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63, Subpart GGG – National Emission Standards for Pharmaceuticals Production.

#### D.12.2 General Standards for 40 CFR 63, Subpart GGG [40 CFR 63.1252]

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- (a) Opening of a safety device. Opening of a safety device, as defined in 40 CFR 63.1251, is allowed at any time conditions require it to do so to avoid unsafe conditions.
  
- (b) Closed-vent systems. Closed-vent systems that contain bypass lines that could divert a vent stream away from a control device used to comply with the requirements in 40 CFR 63.1253, 63.1254, and 63.1256 shall comply with the requirements of Table 4 of 40 CFR 63, Subpart GGG and Condition D.12.2 (b)(1) or (2). Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, rupture disks and pressure relief valves needed for safety purposes are not subject to this condition.
  - (1) Install, calibrate, maintain, and operate a flow indicator that determines whether vent stream flow is present at least once every 15 minutes. Records shall be maintained as specified in 40 CFR 63.1259(i)(6)(i). The flow indicator shall be installed at the entrance to any bypass line that could divert the vent stream away from the control device to the atmosphere; or
  - (2) Secure the bypass line valve in the closed position with a car seal or lock and key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. Records shall be maintained as specified in 40 CFR 63.1259(i)(6)(ii).
  
- (c) Heat exchange systems. Except as provided in Condition D.12.2 (c)(2), the Permittee shall comply with the requirements in Condition D.12.2 (c)(1) for heat exchange systems that cool process equipment or materials used in pharmaceutical manufacturing operations.
  - (1) The heat exchange system shall be treated according to the provisions of 40 CFR 63.104, except that the monitoring frequency shall be no less than quarterly.
  - (2) For identifying leaking equipment, the Permittee of heat exchange systems on equipment which meet current good manufacturing practice (CGMP) requirements of 21 CFR part 211 may elect to use the physical integrity of the reactor as the surrogate indicator of heat exchange system leaks around the reactor.

#### D.12.3 Process Vent Standards [40 CFR 63.1254]

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Plant 41 shall comply with one of the following standards. Notification of a change in the compliance method for any process shall be reported according to the procedures of 40 CFR 63.1260(h).

- (a) 900 / 1800 kg Compliance Option [40 CFR 63.1254(a)(2) and (3)]:
  - (1) Actual HAP emissions from the sum of all process vents within a process (as defined in 40 CFR 63.1251) must not exceed 900 kilograms (kg) in any 365 day period.
  - (2) Actual HAP emissions from the sum of all process vents at the source within processes complying with the 900 kilogram limit in 40 CFR 63.1254(a)(2)(i) are limited to a maximum of 1,800 kilogram in any 365 day period.
  - (3) Emissions from vents that are subject to the requirements of 40 CFR 63.1254(a)(3) and emissions from vents that are controlled in accordance with the alternative limit in 40 CFR 63.1254(c) shall be excluded from the sums calculated above.

- (4) The Permittee may switch from compliance with 40 CFR 63.1254(a)(2) to Compliance with 40 CFR 63.1254(a)(1) only after at least one year of operation in compliance with 40 CFR 63.1254(a)(2).
- (b) 93% Reduction Compliance Option [40 CFR 63.1254(a)(1) and (3)]:  
Uncontrolled HAP emissions from the sum of all process vents within a process that are not subject to 40 CFR 63.1254(a)(3) shall be reduced by 93 percent or greater by weight or any one or more vents within a process may be controlled in accordance with any of the following procedures:
  - (1) To outlet concentrations less than or equal to 20 ppmv as TOC and less than or equal to 20 ppmv as hydrogen halides and halogens; OR
  - (2) By a flare that meets the requirements of §63.11(b)
  - (3) By a control device specified in 40 CFR 63.1257(a)(4).
- (c) If the uncontrolled HAP emissions from any process vent exceed 25 tons per year and the flow-weighted average flowrate ( $FR_a$ ) calculated using Equation 1 in 40 CFR 63.1254(a)(3) is less than or equal to the flowrate index (FRI) calculated using Equation 2 of 40 CFR 63.1254(a)(3), then the Permittee must either:
  - (1) Reduce uncontrolled HAP emissions from that process vent by 98 percent or in accordance with any of the procedures in 40 CFR 63.1254(a)(1)(ii)(A) through (D); OR
  - (2) As an alternative to the 98% reduction in (i) above, the Permittee may comply with the provisions in 40 CFR 63.1254(a)(3)(ii)(A), (B), or (C).
- (d) Alternative Compliance Option [40 CFR 63.1254(c)]:  
The Permittee shall route vents to a noncombustion control device which achieves an outlet TOC concentration, as calibrated on methane or the predominant HAP, of 50 ppmv or less and an outlet concentration of hydrogen halides and halogens of 50 ppmv or less.

#### D.12.4 Monitoring and Compliance Demonstration Requirements [40 CFR 63.1258]

Each process in Plant 41 shall comply with the following based on the compliance option chosen:

- (a) 900 / 1800 kg Compliance Option and 93% Reduction Option:
  - (1) For control devices that control vent streams totaling less than 1 ton per year HAP emissions, before control, the Permittee shall verify daily that the control device is operating properly. If the control device is used to control batch process vents alone or in combination with other streams, the verification may be on a per batch basis. This verification shall include, but not be limited to, a daily or per batch demonstration that the unit is working as designed. Measurements taken for this verification are not considered continuous monitoring systems.
  - (2) For condensers that control vent streams totaling greater than 1 ton per year HAP emissions, before control:
    - (i) The Permittee shall establish the maximum condenser outlet temperature as a site-specific operating parameter.
    - (ii) The Permittee shall measure and record the outlet gas temperature at least every 15 minutes during the period in which the condenser is functioning in achieving HAP removal.

- (iii) The temperature monitoring device must be accurate to within  $\pm 2$  percent of the temperature measured in degrees Celsius or  $\pm 2.5$  degrees Celsius whichever is greater.
  - (iv) The temperature monitoring device must be calibrated annually.
  - (v) Averaging periods for the site-specific operating parameters shall be established according to 40 CFR 63.1258(b)(2)(i) through (iii).
  - (vi) The site specific operating parameters shall be set pursuant to 40 CFR 63.1258(b)(3).
- (3) For scrubbers that control vent streams totaling greater than 1 ton per year HAP emissions, before control:
- (b) The Permittee shall establish a minimum scrubber liquid flow rate or pressure drop as a site-specific operating parameter. If the scrubber uses a caustic solution to remove acid emissions, the Permittee shall establish a minimum pH of the effluent scrubber liquid as a site-specific operating parameter.
- (i) The Permittee shall measure and record either the scrubber liquid flow rate or pressure drop every 15 minutes during the period in which the scrubber is functioning in achieving HAP removal. If the scrubber uses a caustic solution to remove acid emissions, the Permittee shall monitor the pH of the effluent scrubber liquid at least once per day.
  - (ii) The monitoring device(s) used to determine the pressure drop shall be certified by the manufacturer to be accurate to within a gage pressure of  $\pm 10$  percent of the maximum pressure drop measured.
  - (iii) The monitoring device(s) used for measurement of scrubber liquid flow rate shall be certified by the manufacturer to be accurate within  $\pm 10$  percent of the design scrubber liquid flow rate.
  - (iv) The monitoring device(s) shall be calibrated annually.
  - (v) The site specific operating parameters shall be set pursuant to 40 CFR 63.1258(b)(3).

Pursuant to 40 CFR 63.1258(c), the Permittee shall demonstrate continuous compliance with the 900 and 1,800 kilogram per year emission limits by calculating daily 365 day rolling summations of emissions.

- (c) Alternative Compliance Option: The Permittee shall use CEMS to monitor and record the outlet TOC concentration and the outlet hydrogen halide and halogen concentration every fifteen (15) minutes during the period in which the device is functioning in achieving the required HAP removal. The TOC monitor must meet the requirements of EPA Performance Specification 8, 9, or 15 of Appendix B of 40 CFR 60 and shall be installed, calibrated, and maintained according to 40 CFR 63.8.

#### D.12.5 Equipment Leaks Standard [40 CFR 63.1255]

The following provisions apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, control devices, and closed-vent systems that are intended to operate in organic hazardous air pollutant service 300 hours or more during the calendar year and are located at Plant 41.

- (a) Equipment to which 40 CFR 63, Subpart GGG applies shall be identified such that it can be distinguished readily from equipment that is not subject to this NESHAP. Identification of the equipment does not require physical tagging of the equipment. For example, the

equipment may be identified on a plant site plan, in log entries, or by designation of process boundaries by some form of weatherproof identification. If changes are made to the affected source subject to the leak detection requirements, equipment identification for each type of component shall be updated, if needed, within 90 calendar days or by the next Periodic Report following the end of the monitoring period for that component, whichever is later.

- (b) When each leak is detected by visual, audible, or olfactory means, or by monitoring as described in 40 CFR 63.180(b) or (c), the following requirements apply:
  - (1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
  - (2) The identification on a valve in light liquid or gas/vapor service may be removed after it has been monitored as specified in 40 CFR 63.1255(e)(7)(iii), and no leak has been detected during the follow-up monitoring.
  - (3) The identification on equipment, except on a valve in light liquid or gas/vapor service, may be removed after it has been repaired.
- (c) In all cases where the provisions of 40 CFR 63, Subpart GGG require the Permittee to repair leaks by a specified time after the leak is detected, it is a violation of this condition to fail to take action to repair the leaks within the specified time. If action is taken to repair the leaks within the specified time, failure of that action to successfully repair the leak is not a violation of this condition. However, if the repairs are unsuccessful, a leak is detected and the Permittee shall take further action as required by applicable provisions of this condition.
- (d) The following process components in VOHAP/ VOC service shall comply with design standards, shall be operated in accordance with work practice standards and shall undergo periodic monitoring in accordance with the provisions cited below. Periodic monitoring shall be performed in accordance with 40 CFR 63.1255(b)(4)(v) and 40 CFR 63.1255(a)(11)(iv).
  - (1) Pumps in light liquid service shall be operated in accordance with the standard at 40 CFR 63.1255(c);
  - (2) Compressors shall be operated in accordance with the standards at 40 CFR 63.1255(b)(3);
  - (3) Pressure relief devices in gas/vapor service shall be operated in accordance with the standard at 40 CFR 63.1255(b)(3);
  - (4) Sampling connection systems shall be operated in accordance with the standard at 40 CFR 63.1255(b)(3);
  - (5) Open ended valves or lines shall be operated in accordance with the standard at 40 CFR 63.1255(d);
  - (6) Valves in gas/vapor and light liquid service shall be operated in accordance with the standard at 40 CFR 63.1255(e);
  - (7) Closed-vent systems and control devices used to comply with this shall be operated in accordance with the standard at 40 CFR 63.1255(b)(4)(ii);
  - (8) Agitators in gas/vapor and light liquid service shall be operated in accordance with the standard at 40 CFR 63.1255(c);
  - (9) Pumps, valves, connectors, and agitators in heavy liquid service, instrumentation systems, and pressure relief devices in liquid service shall be operated in

accordance with the standard at 40 CFR 63.1255(b)(3); and

- (10) Connectors in gas/vapor and light liquid service shall be operated in accordance with the standard at 40 CFR 63.1255(b)(4)(iii).
- (e) As an alternative to complying with Conditions D.12.5 (d)(1) through D.12.5 (d)(6) and D.12.5 (d)(8) through D.12.5 (d)(10), system components may comply with 40 CFR 63.1255(b)(4)(iv).
- (f) Pursuant to 40 CFR 63.1255(b)(3), which references 40 CFR 63.179 (Alternative means of emission limitation: Enclosed-vented process units), process units enclosed in such a manner that all emissions from equipment leaks are vented through a closed-vent system to a control device meeting the requirements of 40 CFR 63.172 and 40 CFR 1255(b)(4)(ii) are exempted from the requirements of 40 CFR 63.163 through 171, and 40 CFR 63.173 through 174 as referenced by 40 CFR 63.1255. The enclosure shall be maintained under a negative pressure at all times while the process unit is in operation to ensure that all emissions are routed to the control device. The closed vent system and control device must comply with the requirements in Condition D.12.5(d)(7).
- (g) The following equipment is exempt from the monitoring requirements as specified in 40 CFR 63.1255(f)(1)(i) through (iv) provided the Permittee meets the requirements specified in 40 CFR 63.1255(f)(2), (3) or (4) as applicable. All equipment must be assigned to a group of processes.
  - (1) Equipment that is designated as unsafe to monitor or unsafe to inspect pursuant to 40 CFR 63.1255(f)(2);
  - (2) Equipment that is difficult to monitor or difficult to inspect pursuant to 40 CFR 63.1255(f)(3); and
  - (3) Connectors that are inaccessible, ceramic, or ceramic-lined pursuant to 40 CFR 63.1255(f)(4).
- (h) The following facilities are not subject to the equipment leaks standards in 40 CFR 63.1255:
  - (1) Research and development facilities, activities, and equipment [40 CFR 63.1250(d)];
  - (2) Components on transportation equipment and containers (e.g., railroad cars, tanker trucks and drums);
  - (3) Utilities and non-process lines [40 CFR 63.1255(a)(5)];
  - (4) Bench scale processes [40 CFR 63.1255(a)(6)];
  - (5) Equipment in vacuum service [40 CFR 63.1255(a)(8)];
  - (6) Waste components;
  - (7) Equipment that is in HAP service but that is in such service less than 300 hours per calendar year [40 CFR 63.1255(a)(10)]; and
  - (8) Closed loop heat exchange systems [40 CFR 63.1255(a)(5)].

D.12.6 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the packaging facilities shall be limited to 0.03 grains per dry standard cubic foot.

#### D.12.7 Synthesized Pharmaceutical Manufacturing Operations [326 IAC 8-5-3]

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All reactors, distillation units, dryers, storage of volatile organic compounds, transfer of volatile organic compounds, extraction equipment, filters, crystallizers, and centrifuges that have the potential to emit equal to or greater than fifteen (15) pounds per day shall comply with the following requirements:

- (a) Volatile organic compound emissions from all reactors, distillation operations, crystallizers, centrifuges, and vacuum dryers shall be controlled by surface condensers or equivalent controls.
  - (1) The outlet gas temperature for surface condensers must not exceed:
    - (A) minus twenty-five degrees Celsius (-25°C) when condensing VOC of vapor pressure greater than forty (40) kilo Pascals (five and eight-tenths (5.8) pounds per square inch);
    - (B) minus fifteen degrees Celsius (-15 °C) when condensing VOC of vapor pressure greater than twenty (20) kilo Pascals (two and nine-tenths (2.9) pounds per square inch);
    - (C) zero degrees Celsius (0 °C) when condensing VOC of vapor pressure greater than ten (10) kiloPascals (one and five-tenths (1.5) pounds per square inch);
    - (D) ten degrees Celsius (10 °C) when condensing VOC of vapor pressure greater than seven (7) kiloPascals (one (1) pound per square inch); or
    - (E) twenty-five degrees Celsius (25 °C) when condensing VOC of vapor pressure greater than three and five-tenths (3.5) kilo Pascals (five-tenths (0.5) pound per square inch).
  - (2) The vapor pressures listed above shall be measured at twenty degrees Celsius (20 °C).
  - (3) Where equivalent controls are used, the VOC emissions must be reduced by at least as much as they would be by using a surface condenser which meets the requirements of paragraph (a)(1) of this condition.
- (b) VOC emissions from all air dryers and production equipment exhaust systems shall be limited to thirty-three (33) pounds per day.
- (c) The Permittee shall:
  - (A) provide a vapor balance system or equivalent control that is at least ninety percent (90%) effective in reducing emissions from truck or railcar deliveries to storage tanks with capacities greater than two thousand (2,000) gallons that store VOC with vapor pressures greater than twenty-eight (28) kiloPascals (four and one-tenth (4.1) pounds per square inch) at twenty degrees Celsius (20 °C); and
  - (B) install pressure/vacuum conservation vents set at plus or minus two-tenths ( $\pm 0.2$ ) kilo Pascals on all storage tanks that store VOC with vapor pressures greater than ten (10) kilo Pascals (one and five-tenths (1.5) pounds per square inch at twenty degrees Celsius (20 °C)), unless a more effective control system is used.
- (d) All centrifuges, rotary vacuum filters, and other filters having an exposed liquid surface, where the liquid contains VOC and exerts a total VOC vapor pressure of three and five-tenths (3.5) kiloPascals (five-tenths (0.5) pounds per square inch) or more at twenty degrees Celsius (20 °C ) shall be enclosed.

- (e) All inprocess tanks containing a volatile organic compound at any time shall be equipped with covers. These covers must remain closed, unless production, sampling, maintenance, or inspection procedures require operator access.
- (f) The Permittee shall repair all leaks from which a liquid, containing VOC, can be observed running or dripping. The repair shall be completed the first time the equipment is off line for a period of time long enough to complete the repair.

#### D.12.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

### **Compliance Determination Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

#### D.12.9 Particulate Control

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In order to comply with D.12.6, the baghouses used for particulate control shall be in operation and control emissions from the packaging facilities at all times that the packaging facilities are in operation.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.12.10 Visible Emissions Notations

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- (a) Visible emission notations of the packaging facility stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation Records and Reports shall be considered a deviation from this permit.

#### D.12.11 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the packaging facilities, at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across baghouses is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

#### D.12.12 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling the process when

venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.12.13 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
  
- (a) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

## **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.12.14 Recordkeeping Requirements for 40 CFR 63, Subpart GGG [40 CFR 63.1259]**

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Pursuant to 40 CFR 63.1259, the Permittee shall keep the following records:

- (a) The Permittee shall develop and implement a written startup, shutdown and malfunction plan as specified in 40 CFR 63.6(e)(3). This plan shall describe in detail procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program for corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with Subpart GGG. Current and superseded versions shall be kept onsite. The Permittee shall keep startup, shutdown and malfunction records.
- (b) For control devices that control vent streams totaling less than 1 ton per year HAP emissions, before control, the Permittee shall keep records of the daily verifications that each control device is operating properly.
- (c) For each process using the 900 / 1800 kg Compliance Option, the Permittee shall keep daily records of the rolling annual total emissions.
- (d) For each condenser or scrubber controlling vent streams totaling greater than 1 ton per year HAP emissions, before control, the Permittee shall keep records of outlet gas temperature, scrubber liquid flow rate, and pressure drop as applicable.
- (e) For each process using continuous monitoring systems, the Permittee shall maintain continuous monitoring system records specified in 40 CFR 63.10(c)(1) through (14). Pursuant to 40 CFR 63.1259(b)(3), the Permittee shall maintain records documenting the completion of calibration checks and maintenance of continuous monitoring systems.
- (f) Pursuant to 40 CFR 63.1259(b)(5), the Permittee shall keep records of the following, as appropriate:
  - (1) The number of batches per year for each batch process;
  - (2) The operating hours per year for continuous processes;
  - (3) Standard batch uncontrolled and controlled emissions for each process;
  - (4) Actual uncontrolled and controlled emissions for each nonstandard batch;
  - (5) A record whether each batch operated was considered a standard batch;
- (g) The Permittee shall keep a schedule or log of each operating scenario updated daily or, at a minimum, each time a different operating scenario is put into operation. Records shall be sufficient to demonstrate which operating scenario apply to each process for each day.
- (h) The Permittee shall keep a description of worst-case operating conditions as required in 40 CFR 63.1257(b)(8).
- (i) The Permittee shall keep records of all maintenance performed on the air pollution control equipment.
- (j) Records relating to leak detection and repair shall be kept in accordance with 40 CFR 63.1255(g).
- (k) The following records relating to wastewater shall be kept:
  - (1) The Permittee shall keep records documenting decisions to use a delay of repair due to unavailability of parts, as specified in 40 CFR 63.1256(i).

- (2) For transfers of affected wastewater streams or residuals removed from an affected wastewater stream in accordance with 40 CFR 63.1256(a)(5), the Permittee shall keep a record of the notice sent to the treatment operator stating that the wastewater stream or residual contains organic HAP which are required to be managed and treated in accordance with the provisions 40 CFR 63, Subpart GGG.
- (3) A record, as applicable, that each waste management unit inspection required by 40 CFR 63.1256(b) through (f) was performed.

#### D.12.15 Record Keeping Requirements

- (a) To document compliance with Condition D.12.10, the Permittee shall maintain records of visible emission notations of the packaging facilities stack exhausts once per shift.
- (b) To document compliance with Condition D.12.11, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.12.12, the Permittee shall maintain records of the results of the inspections ~~required under Condition D.10.6~~ and the dates the vents are redirected.
- (d) To document compliance with Condition D.12.8, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.12.16 Reporting Requirements [40 CFR 63.1260]

- (a) The Permittee shall submit semiannual Periodic Reports. When a new operating scenario has been operated since the last Periodic report, quarterly reports shall be submitted.
- (b) The Permittee must submit a report 60 days before the scheduled implementation date of either any change in the activity covered by the Precompliance report or a change in the status of a control device from small to large.
- (c) Whenever a process change is made or there is a change in any of the information submitted in the Notification of Compliance Status Report (other than those changes covered in (2) above), the Permittee shall submit the following information with the next Periodic report:
  - (1) A brief description of the process change;
  - (2) A description of any modifications to standard procedures or quality assurance procedures;
  - (3) Revisions to any of the information reported in the original Notification of Compliance Status Report;
  - (4) Information required by the Notification of Compliance Status Report for changes involving the addition of processes or equipment.
- (d) The Permittee shall prepare startup, shutdown, and malfunction reports as outlined in 40 CFR 63.1260(i).
- (e) Reporting relating to leak detection and repair shall be conducted in accordance with 40 CFR 63.1255(h).

## SECTION D.13

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (i) Cold cleaning operating with potential emissions of less than three (3) pounds per hour (lbs/hr) or fifteen (15) pounds per day (lbs/day) of VOC.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.13.1 Cold Cleaner Degreaser Operations and Control [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**And  
City of Indianapolis  
Office of Environmental Services**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Reilly Industries, Inc.  
Source Address: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
Mailing Address: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
Part 70 Permit No.: T097-7552-00315

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015**

**Indianapolis, Indiana 46206-6015**

**Phone: 317-233-5674**

**Fax: 317-233-5967**

**And**

**City of Indianapolis  
Office of Environmental Services**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Reilly Industries, Inc.  
Source Address: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
Mailing Address: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
Part 70 Permit No.: T097-7552-00315

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--|

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

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

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

Page 2 of 2

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
And  
City of Indianapolis  
Office of Environmental Services**

**Part 70 Quarterly Report**

Source Name: Reilly Industries, Inc.  
Source Address: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
Mailing Address: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
Part 70 Permit No.: T097-7552-00315  
Facility: Boiler CB-70K  
Parameter: Distillate fuel oil and fuel oil equivalents  
Limit: 1,124 kgallons of distillate fuel oil and fuel oil equivalents

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

Note: For the purposes of determining compliance, burning 1 MMcf of natural gas in Boiler CB-70K is Equivalent to burning 1.41 kgallons of distillate fuel oil.

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
And  
City of Indianapolis  
Office of Environmental Services**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Reilly Industries, Inc.  
Source Address: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
Mailing Address: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
Part 70 Permit No.: T097-7552-00315

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

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This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis, Office of Environmental Services**  
Technical Support Document (TSD) for a Part 70 Operating Permit

**Source Background and Description**

Source Name: Reilly Industries, Inc.  
Source Location: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
County: Marion  
SIC Code: 2899 and 2869  
Operation Permit No.: T097-7552-00315  
Permit Reviewer: ERG/AAB

The Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) have reviewed a Part 70 Operating Permit application from Reilly Industries, Inc. relating to the operation of a chemical plant used to manufacture pyridine, pyridine derivatives, organic acid esters, niacinamide (B-3) and other organic chemicals.

**History**

This chemical plant was previously permitted as two sources with assigned source numbers of 0048 and 0049. Since this chemical plant meets the definition of a source provided in 326 IAC 1-2-73, Reilly Industries, Inc. stated in their December 11, 1996 application that a single Title V Permit should be issued for the entire plant. The combined chemical plant has since been assigned the source number 097-00315. Note that this company was previously known as Reilly Tar and Chemical Corporation. The name of the company was changed in January 1989. Plant 26, which was originally constructed in the 1940s, was decommissioned in 2002.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) natural gas-fired boiler (identified as unit 11-112E) having a maximum heat input capacity of 14.4 MMBtu per hour, used to recover waste heat from Plant 41 waste gas incinerator (identified as unit CP41GCS). This boiler was constructed in 1953 and exhausts to stack S-29-001.
- (b) One (1) boiler (identified as unit 28-186N) having a maximum heat input capacity of 36.8 MMBtu per hour and capable of being fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No.6, process emissions, and hazardous waste. This boiler was constructed in 1959 and exhausts to stack S-29-002.
- (c) One (1) boiler (identified as unit 30-2726S) having a maximum heat input capacity of 40.65 MMBtu per hour and fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No.6, process emissions, and hazardous waste. This boiler was constructed in 1964 and exhausts to stack S-29-003.
- (d) One (1) boiler (identified as unit 70-2722W) having a maximum heat input capacity of 91.8 MMBtu per hour and fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No. 6, process emissions, and hazardous waste. This boiler was constructed in 1969 and exhausts to stack S-29-004.

- (e) One (1) natural gas-fired boiler (identified as unit CB600-300) having a maximum heat input capacity of 25.1 MMBtu per hour. The boiler also burns miscellaneous emissions from the wastewater treatment plant. This boiler was installed in 1990 and exhausts to stack S-29-005.
- (f) One (1) natural gas-fired boiler (identified as unit CN5-400) having a maximum heat input capacity of 61.1 MMBtu per hour. This boiler was constructed in 1995 and exhausts to stack S-29-006.
- (g) One (1) natural gas-fired boiler (identified as unit CB-70K) having a maximum heat input capacity of 91.1 MMBtu per hour. This boiler may also be fired using fuel oils No.1, No.2, No.4, No.5, and No.6, and process emissions. This boiler was installed in 1999 and exhausts to stack S-29-007.
- (h) Eleven (11) process heaters, including:
  - (1) One (1) Born heater (identified as unit 722804) having a maximum heat input capacity of 6.7 MMBtu per hour and fired using natural gas and/or process emissions. This unit was installed in 1972.
  - (2) One (1) Born hot oil heater (identified as unit BX2707V) having a maximum heat input capacity of 16.0 MMBtu per hour and fired using natural gas and/or process emissions. This unit was installed in 1967 and exhausts to stack S-27-001.
  - (3) One (1) Born heater (identified as unit BXS2706Q) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas and/or process emissions. This unit was installed in 1962.
  - (4) One (1) Born heater (identified as unit BS2740Q) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas and/or process emissions. This unit was installed in 1963.
  - (5) One (1) Born heater (identified as unit BT2728S) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas and/or process emissions. This unit was installed in 1964.
  - (6) One (1) BM Furnace (identified as unit BM2724W) having a maximum heat input capacity of 21.38 MMBtu per hour and fired using natural gas. This unit was installed in 1969 and exhausts to stack S-27-003.
  - (7) One (1) BD Furnace (identified as unit BD2714V) having a maximum heat input capacity of 15.0 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1968 and exhausts to stack S-27-002.
  - (8) One (1) Born heater (identified as unit SB2710P) having a maximum heat input capacity of 7.5 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1962.
  - (9) One (1) Born heater (identified as unit NB2720Q) having a maximum heat input capacity of 7.5 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1963.
  - (10) One (1) Born heater (identified as unit EP2729Q) having a maximum heat input capacity of 43.0 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1963.
  - (11) One (1) Born Furnace (identified as unit 732714) having a maximum heat input capacity of 36.0 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1974 and exhausts to stack S-27-005.

- (i) Wastewater handling operations, including one (1) Wastewater Treatment Plant, constructed in 1979, having a nominal throughput capacity of 350 gallons of wastewater per minute. The Wastewater Treatment Plant treats wastewater from Plants 27, 28, 40, 41, 47, and 48 and offsite wastewater. Plant sewers are pumped to wastewater storage tanks for processing. Depending on the contents of the wastewater, the wastewater may be pH adjusted, clarified, filtered, and/or steam stripped as needed prior to discharge to the POTW. The Wastewater Treatment Plant consists of one (1) large surge volume tank (identified as the North API), four (4) wastewater storage tanks (identified as tanks 15, 16, 17, and 18), one (1) neutralization tank, one (1) clarification/flocculation tank, one (1) plate and frame filter press, and one (1) steam stripper for press filtrate. The plant also has a 78,750 Btu/ft<sup>3</sup> sludge dryer that is not currently in use. The wastewater operations consist of two (2) Group 2 wastewater streams identified as 140 Bottoms and 75 Flow.
- (j) Plant 27 used to manufacture pyridine and picolines. The plant was initially constructed in 1961 and consists of reactors, a product recovery unit, distillation columns, and two (2) cooling towers. A catalyst regenerator (identified as unit BX27REG) is also located in this plant. The catalyst regenerator has a maximum throughput capacity of 10.2 ton of catalyst per hour and emissions of particulate matter are controlled using a cyclone (with same ID as the regenerator), which exhausts to stack S-27-006.
- (k) Plant 38 used to manufacture various grades of vitamins. The plant was initially constructed in 1967 and consists of the following emission units:
  - (1) Reactors;
  - (2) Separators;
  - (3) Dryers with emissions controlled by a baghouse and scrubber;
  - (4) One (1) packaging facility consisting of the following:
    - (i) one (1) mill (identified as 28-MB), with a maximum throughput of 2,000 pounds of product per hour. This unit exhausts at stack S-28-010.
    - (ii) One (1) Vacuum Receiver (identified as 28-VR), installed in 1996, with a maximum throughput capacity of 6,750 pounds of product per hour. This unit exhausts at stack S-28-004.
- (l) Plant 41 used to manufacture pyridine and picoline derivatives and picolines. The plant was initially constructed in 1968. Plant 41 consists of the following facilities:
  - (1) Reactor;
  - (2) Separation facility with emissions controlled using one (1) 8.0 MMBtu per hour waste gas incinerator (identified as unit CP41GCS), which exhausts to stack S-41-001;
  - (3) Distillation.
- (m) One (1) Niacinamide Packaging Unit that includes:
  - (1) one (1) Mill Bag House (constructed 1992), with a maximum throughput capacity of 2,000 pounds per hour;
  - (2) one (1) Vacuum Receiver (construction 1996), with a maximum capacity of 6,750 pounds per hour; and
  - (3) one (1) Pick-up Bag House (constructed in 1981) with a maximum capacity of 150 pounds per hour.

- (n) Plant 40 is used to dehydrate 2-picolinic acid or 4-picolinic acid with caustic to produce vinyl pyridine. The plant was initially constructed in 1969. Plant 40 consists of the following process units: reactor, separation, distillation, and vent tank. Emissions are vented through six vents identified as follows:
- (1) Column #3 Atmospheric Vent (S/V 40/001) used to vent emissions from the separation facilities;
  - (2) Receiver Atmospheric Vents (S/V 40-002A, 40-002B, and 40-002C) used to vent emissions from the distillation facilities;
  - (3) Still Atmospheric Vent (S/V 40-003) used to vent emissions from the distillation facilities; and
  - (4) Vent tank (S/V 40-004) used to vent emissions from the vent tank.
- (o) Plant 47, used to manufacture a variety of specialty chemicals. The plant was initially constructed in 1979 and consists of the following facilities:
- (1) Reactor
  - (2) Distillation
  - (3) Separation
  - (4) Drying facility with emissions controlled by a scrubber
  - (5) One (1) 0.4 MMBtu per hour waste gas incinerator (identified as unit HC47GFS), used to control emissions from Plant 47. This unit was installed in 1979 and exhausts to stack S-47-001.
  - (6) One (1) CS Kettle equipped with a 5 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.
  - (7) One (1) CS Still equipped with an 8.48 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.
- (p) Plant 48, used to manufacture a variety of specialty chemicals. The plant was initially constructed in 1972 and consists of reactors (with emissions controlled by a scrubber) and distillation facilities.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval**

There are no new emission units proposed for this source at this time.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
- (1) One (1) Born heater (identified as unit FC2607T) having a maximum heat input

capacity of 3.6 MMBtu per hour and fired using natural gas.

- (2) One (1) Alcorn heater (identified as unit AL2713W) having a maximum heat input capacity of 9.8 MMBtu per hour and fired using natural gas.
- (b) One (1) storage tank (identified as T-254) having a maximum storage capacity of 19,275 gallons and used to store benzene. This storage tank was constructed May 1990.
- (c) The following storage tanks with storage capacities less than 10,000 gallons, which may be used to store benzene:

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
Plant 26	2600	2,961	1974
	26007	2,961	1974
	2601	2,961	1974
	2602	2,961	1974
	2604A	3,948	1983
	2605A	1,763	1980
	2606A	1,763	1980
	2607	1,316	1980
	2608	1,316	1980
	2609A	2,133	1980
	2610	2,133	1980
	26101A	2,133	1980
	26102C	2,133	1980
	26103A	2,133	1980
	26104A	2,133	1980
	2611A	2,133	1982
	2612A	2,133	1982
	2613	2,133	1978
	2614	2,133	1978
	2615	2,133	1980
	2616	2,133	1980
	2617	2,133	1980
	2618A	6,792	1980
	26199	846	1980
	2619A	564	1980
	2620A	2,538	1980
	2621A	2,538	1980
	2622A	2,538	1980
	2623A	6,792	1980
	2624	6,792	1980
	2625	6,792	1980
	26266A	2,138	1980
	2626B	2,138	1980
	2628	3,305	1980
	26299	846	1980
	2630A	2,961	1974
	2631A	2,961	1974
	2632A	2,961	1974
	2633	2,961	1974
	2634A	2,961	1974
	2635A	2,961	1974
	2636	2,961	1974
2637	6,792	1974	
2638	7,614	1974	
2639	7,614	1974	
2640	7,614	1974	
2641A	4,888	1980	
2642A	4,888	1980	
2643A	4,888	1980	
2644	7,614	1974	
2646	3,760	1980	
2649	9,400	1995	
2693A	881	1980	
2694	1,269	NA	
2696	1,469	1980	
2697	1,469	1980	

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
Plant 27	2698A	1,469	1980
	212	6,169	1980
	233	7,638	1980
	234	7,638	1980
	257	2,979	1980
	271	8,813	1980
	272	8,813	1980
	273	8,813	1980
	299	5,264	1980
	457	4,888	1993
	458	4,888	1993
	600	6,169	1973
	699	5,264	1973
	Plant 38	501	5,200
502		5,200	1981
506		5,200	1980
507		5,200	1980
508		5,200	1981
509		5,200	1981
516		5,200	1970
517		5,200	1980
518		5,200	1970
519		5,200	1980
Plant 40	300	2,221	1980
	301	2,221	1980
	302	6,169	1995
	303	6,169	1984
	304	6,169	1984
	311A & C	2,056	1980
	311B	1,542	1980
	312	6,169	1980
	313	6,169	1980
	314	6,169	1980
	362	2,133	NA
	368	5,875	1989
	370	2,327	NA
	371	4,512	1980
399	6,169	NA	
Plant 41	21	5,585	1980
	23	2,735	NA
	24	2,735	NA
	25	2,003	NA
	26	2,009	1980
	38	5,949	1980
	43	6,169	1980
	44	6,169	1980
	45	6,169	1980
	46	6,169	1980
	47	6,169	1980
	48	6,169	1980
	56	9,988	NA
	57	8,065	1980
	211	6,169	1980
	213	6,169	1980
	214	6,169	1980
	236	7,820	1980
	298	1,269	1980
299	5,264	NA	
Plant 47	514	2,115	1980
	710	4,402	1981
	711	4,402	1981
	712	7,638	1980
	714	7,826	1981
	750	3,455	1979
	751	3,455	1979
	752	3,455	1979
	753	3,455	1979
	754	3,455	1979
755	3,455	1979	

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
	756	3,455	1979
	757	3,455	1979
	758	3,455	1979
	759	3,455	1979
	760	3,455	1979
	761	3,455	1979
	762	3,455	1979
	763	3,455	1979
	764	3,455	1979
	766	6,363	1979
	770	6,363	1979
	771	6,363	1979
	772	8,531	1991
	780	6,363	NA
	781	6,363	1991
	785	3,455	1979
<b>Plant 48</b>	405	5,182	1972
	406	5,182	1972
	540	6,463	1988
	541	6,463	1988
	542	6,463	1972
	543	6,463	1972
	545	6,463	1972
	546	6,463	1972
	547	6,463	1972
	548	6,463	1988
	550	6,463	1972
	551	6,463	1972
	552	6,463	1972
	553	6,463	1972
	556	6,463	1980
	557	6,463	1980
	558	9,342	1980
	599	1,904	1980
<b>Wastewater Treatment Plant (Plant 49)</b>	4923	3,995	1991
	4929	8,813	1991
	116	1,692	1991

NA – Construction date unknown.

- (d) Three (3) storage tanks (identified as T-200, T-201, and T-202) located at Plant 27, each with a storage capacity of 47,000 gallon, and used to store formaldehyde. These tanks were constructed in 1992.
- (e) Nine (9) storage tanks subject to 40 CFR 60, Subpart Kb and 326 IAC 12:

Plant Location	Tank ID	Storage Capacity (gallons)	Date Constructed
Plant 26	2652	?	1995
Plant 27	118	26,227	1989
Plant 29	2969	85,308	1996
Plant 40	359	21,997	1991
	360	21,997	1991
	372	21,997	1994
	373	21,997	1994
Plant 41	235	31,773	1995
Wastewater Treatment Plant (Plant 49)	CL-101	90,243	1991

- (f) Nineteen (19) storage tanks subject to 326 IAC 12:

Plant Location	Tank ID	Storage Capacity (gallons)	Date Constructed
Plant 26	2647	10,575	1994
Plant 26	2650	16,921	1995

Plant Location	Tank ID	Storage Capacity (gallons)	Date Constructed
Plant 26	2651	16,921	1995
Plant 40	305	15,028	1989
	366	11,750	1989
	367	11,750	1989
Plant 41	11	15,274	1989
	30	15,274	1989
	33	15,274	1997
	35	15,274	1991
	37	15,274	1994
	225	19,858	1996
Plant 48	536	11,750	1989
	537	11,750	1997
	538	11,750	1997
Wastewater Treatment Plant (Plant 49)	4927	11,844	1991
	107	16,921	1991
	110	12,796	1991
	T-101	13,536	1991

- (g) Four (4) pressurized storage tanks consisting of the following:
- (1) Two (2) pressurized storage tanks (identified as T-260 and T-261), located at Plant 27 and used to store propionaldehyde, each with a maximum storage capacity of 42,600 gallons. These storage tanks were constructed prior to 1984.
  - (2) Two (2) pressurized storage tanks (identified as T-262 and T-263), located at Plant 27 and used to store acetaldehyde, each with a maximum storage capacity of 300,000 gallons. These storage tanks were constructed prior to 1984.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (i) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (j) Soil remediation units constructed in 1999, and consisting of eleven (11) individual soil vapor extraction wells. Only five (5) vapor extraction wells are used for extracting vapors from the subsurface soils at any given time. The soil remediation units have VOC emissions less than 3 pounds per hour or 15 pounds per day; single HAP emissions less than 5 pounds per day or 1 ton per year; and combined HAP emissions less than 12.5 pounds per day or 2.5 tons per year.
- (k) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (l) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (m) Combustion source flame safety purging on startup.
- (n) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (o) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (p) Cleaners and solvents characterized as follows: (A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or; B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C

(68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (q) Closed loop heating and cooling systems.
- (r) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (s) Heat exchanger cleaning and repair.
- (t) Paved and unpaved roads and parking lots with public access.
- (u) Asbestos abatement projects regulated by 326 IAC 14-10.
- (v) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (w) 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.
- (x) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (y) Stationary fire pumps.
- (z) Purge double block and bleed valves.
- (aa) Filter or coalescer media changeout.
- (bb) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (cc) Insignificant storage tanks with VOC emissions less than 3 pounds per hour or 15 pounds per day; single HAP emissions less than 5 pounds per day or 1 ton per year; and combined HAP emissions less than 12.5 pounds per day or 2.5 tons per year, including:

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
Plant 26	2603	NA	1983
	2645A	10,188	1974
	2648	10,152	1995
Plant 27	60	259,095	1980
	61	259,095	1980
	62	259,095	1980
	63	259,095	1980
	67	259,095	1980
	70	259,095	1980
	71	259,095	1980
	72	259,095	1980
	73	259,095	1980
	101	51,702	1961
	102	51,702	1980
	103	51,702	1980
	105	102,369	1963
	106	132,192	1980
	107	132,192	1980
	108	132,192	1980
	109	132,192	1980
110	132,192	1980	
112	51,702	1980	
113	51,702	1980	
116	51,702	1980	
117	51,702	1980	

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	200	51,702	1980
	201	51,702	1980
	202	51,702	1980
	203	51,702	1980
	204	51,702	1980
	205	51,702	1980
	206	51,702	1980
	207	51,702	1961
	208	19,858	1962
	209	19,858	1980
	210	19,858	1980
	240	19,858	1980
	241	19,858	1980
	242	19,858	1980
	243	19,858	1980
	244	19,858	1980
	250	19,858	1980
	251	19,858	1980
	252	19,858	1980
	253	19,858	1980
	254	19,858	1980
	270	25,381	1980
	274	28,287	1980
	411	19,858	1980
	412	19,858	1980
	413	19,858	1980
	414	19,858	1980
	415	19,858	1980
	421	19,858	1980
	422	19,858	1980
	423	19,858	1980
	424	19,858	1980
	425	19,858	1980
	431	19,858	1980
	432	19,858	1980
	433	19,858	1980
	434	19,858	1980
	435	19,858	1980
	441	19,858	1980
	442	19,858	1980
	443	19,858	1980
	444	19,858	1980
	445	19,858	1980
	451	19,858	1980
	452	19,858	1980
	453	19,858	1980
	454	19,858	1980
	455	19,858	1980
	528	13,154	1980
	529	13,154	1980
	601	20,728	1973
	602	20,728	1973
	603	20,728	1973
	604	20,728	1973
	605	20,728	1973
	606	20,728	1973
	607	29,940	1973
	608	29,940	1973
	609	50,668	1996
	610	27,637	1995
	611	29,940	1971
	612	29,940	1973
	620	29,940	1969
	621	29,940	1980
	622	29,940	1980
	630	29,940	1980
	631	29,940	1980
	632	29,940	1980
	640	98,703	1980

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	641	98,703	1980
	650	30,063	1980
	651	30,063	1980
Plant 29	2938	44,945	1980
	2939	44,945	1980
	2969	85,308	1996
	2964	259,095	1980
	2965	259,095	1980
	2966	259,095	1980
	2938	44,945	1980
	2939	44,945	1980
	2964	259,095	1980
	2965	259,095	1980
	2966	259,095	1980
Plant 38	521	11,750	1980
	522	11,750	1980
	523	11,750	1980
	524	20,305	1987
	525	20,305	1987
	526	11,750	1965
Plant 40	321	21,997	1980
	322	21,997	1980
	323	21,997	1980
	324	29,940	1980
	331	21,997	1980
	332	21,997	1980
	333	29,940	1980
	334	29,940	1980
	335	21,997	1997
	341	21,997	1980
	342	21,997	1980
	343	21,997	1980
	344	21,997	1980
	350	21,997	1980
	351	21,997	1980
	352	21,997	1980
	353	21,997	1980
	354	11,750	1980
	355	11,750	1980
	356	11,750	1980
	357	11,750	1980
358	11,750	1980	
361	11,750	1980	
363	11,750	1980	
Plant 41	1	15,274	1980
	2	15,274	1980
	3	15,274	1980
	4	15,274	1980
	5	15,274	1980
	6	15,274	1980
	7	15,170	1980
	8	15,170	1980
	9	15,274	1980
	10	13,227	1980
	12	15,274	1980
	13	15,274	1980
	14	15,274	1980
	15	15,274	1980
	16	15,274	1980
	17	15,274	1980
	18	15,274	1980
	19	15,274	1980
	30	15,274	1989
	31	15,274	1980
	32	15,274	1980
34	15,274	1980	
36	15,274	1980	
40	16,351	1980	
215	19,858	1980	

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	216	19,858	1980
	217	19,858	1980
	218	19,858	1980
	219	19,858	1980
	220	19,858	1980
	221	19,858	1980
	222	19,858	1980
	223	19,858	1980
	224	19,858	1980
	225	19,858	1996
	226	19,858	1962
	227	19,858	1980
	228	19,858	1980
	229	19,858	1980
	230	19,858	1980
	232	20,851	1980
Plant 47	700	10,152	1981
	701	10,152	1981
	702	10,152	1980
	716	11,844	1980
	717	10,152	1981
	718	10,152	1981
	719	10,152	1981
	720	10,152	1981
	721	10,152	1981
	722	10,152	1981
	726	10,152	1981
	727	10,152	1981
	728	10,152	1981
	774	10,152	1980
	775	21,151	1999
	776	21,151	1999
	777	10,152	1979
	778	10,152	1979
	779	10,152	1979
	790	13,513	Prior to 1984
	791	13,513	1980
	792	13,513	1980
	793	13,513	1980
	794	13,513	1973
	795	13,513	1980
	797	20,305	1998
	798	10,152	1997
	799	14,806	1980
Plant 48	401	14,394	NA
	530	11,750	1972
	531	11,750	1972
	532	11,750	1972
	535	11,750	1972
	557	6,463	1980
	558	9,342	1980
Wastewater Treatment Plant (Plant 49)	4915	82,911	1980
	4916	82,911	1980
	4917	476,595	1980
	4918	476,595	1980
	4919	19,858	1980
	4921	16,921	1980

NA – No data available.

### Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (1) Construction Permit 10126, issued July 21, 1970;
- (2) Construction Permit 10388, issued February 7, 1973;

- (3) Construction Permit 10492, issued May 29, 1974;
- (4) Construction Permit 10497, issued August 29, 1974;
- (5) Construction Permit 10498, issued August 29, 1974;
- (6) Construction Permit 10868, issued January 8, 1979;
- (7) Construction Permit 10869, issued January 8, 1979;
- (8) Construction Permit 10870, issued January 8, 1979;
- (9) Construction Permit 10871, issued January 8, 1979;
- (10) Construction Permit 10872, issued January 8, 1979;
- (11) Construction Permit 10913, issued August 29, 1979;
- (12) Construction Permit 10936, issued July 1, 1980;
- (13) Operating Permit, issued February 11, 1987;
- (14) Construction Permit, issued April 9, 1987;
- (15) Operating Permit, issued October 30, 1987;
- (16) Operating Permit, issued January 20, 1988;
- (17) Operating Permit, issued May 4, 1988;
- (18) Construction Permit 900049-01, issued March 26, 1990;
- (19) Operating Permit, issued April 30, 1990;
- (20) Operating Permit, issued March 1, 1991;
- (21) Operating Permit, issued July 8, 1991;
- (22) Construction Permit 930049-01, issued October 18, 1993;
- (23) Construction Permit 940048-01, issued March 7, 1995;
- (24) Construction Permit 950048-01, issued September 28, 1995;
- (25) Revised Construction Permit 940048-01, issued December 13, 1995;
- (26) Construction Permit 960048-1, issued November 18, 1996;
- (27) Construction Permit 960048-02, issued January 13, 1997;
- (28) Source Modification 097-11345-00315, issued September 23, 1999; and
- (29) Exemption 097-12653-00315, issued October 23, 2000.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined to be no longer applicable and are not included in this Part 70 Permit:

- (a) All construction conditions from previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) CP 950048-01, issued March 7, 1995 and revised December 13, 1995.  
Condition 4: The short term allowable NOx emissions are based on restricting the long term allowable NOx emission to less than 40 tons per 12 consecutive months such that the Prevention of Significant Deterioration Regulation 326 IAC 2-2 shall not apply. The boiler shall be limited to combusting no more than 639,897,000 cubic feet of natural gas per 12 consecutive month period such that allowable NOx emissions are less than 40 tons. This limitation is based upon actual emission of 0.133 lbs NOx per MMBtu of heat input and 940 Btu per cubic foot of natural gas.

Reason not incorporated: Using current AP-42 emission factors, the potential to emit nitrogen oxide from the 61.1 MMBtu per hour boiler (identified as CN5-400) is 26.8 tons per year based on 8,760 hours of operation. In addition, the maximum amount of natural gas that can be burned in the boiler, assuming 910 Btu per cubic foot of natural gas and 8,760 hours of operation, is 588 million cubic feet per year, which is less than the 639 million cubic foot per year limit provided in this condition. Since the potential to emit nitrogen oxides is less than the 40 tons per year threshold required to trigger PSD (326 IAC 2-2), the fuel usage and emissions limit in this condition is unnecessary.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 Part 70 permit application for the purposes of this review was received on December 11, 1996. Additional information was received from Reilly between July 15, 2002 and March 2004.

There was no notice of completeness letter mailed to the Permittee.

### Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	Greater than 100
PM10	Greater than 100
SO <sub>2</sub>	Greater than 250
VOC	Greater than 100
CO	Greater than 100
NO <sub>x</sub>	Greater than 250

HAPs	Potential to Emit (tons/yr)
Individual HAP	Greater than 10
Total	Greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, SO<sub>2</sub>, VOC, CO, and NO<sub>x</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
 Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	20.2
PM10	21.8
SO <sub>2</sub>	16.5
VOC	80.7
CO	2,831
NO <sub>x</sub>	89.6
Lead	negligible
Hydrogen Cyanide	2.28

**County Attainment Status**

The source is located in Marion County.

Pollutant	Status
PM10	Unclassifiable
SO <sub>2</sub>	Maintenance Attainment
NO <sub>2</sub>	Maintenance Attainment
Ozone	Maintenance Attainment
CO	Attainment
Lead	Unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability - Boilers

- (a) Boilers CB600-300, CN5-400, and CB-70K are subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because they were constructed after June 9, 1989 and have heat input capacities greater than 10 MMBtu/hr and less than 100 MMBtu/hr.

Since boiler CB-70K uses fuel oil as an alternative fuel, the source must comply with the following requirements for this boiler:

Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), the sulfur content of the fuel oil burned in each of these boilers shall not exceed five-tenths percent (0.5%) by weight [40 CFR 60.42c(d)]. This fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction. The source must demonstrate compliance by either:

- (1) Providing vendor analysis of fuel delivered with vendor certification; or
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19. Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted. If a partially empty fuel tank is refilled, a new sample and analysis would be required after filling.

Boilers CN5-400 and CB600-300 are subject to only the record keeping requirements in 40 CFR 60.48c because these boilers do not burn fuel oil or coal. Pursuant 40 CFR 60.48c, the source is required to maintain daily records of the amount and type of fuel burned in these boilers. If the source would like to change the frequency of record keeping from daily recording to monthly recording, then the source must send a letter requesting this change to the following address:

George Czerniak  
c/o U.S. Environmental Protection Agency, Region V  
Air and Radiation Division  
Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

The request should reference the NSPS requirement and the EPA memorandum from John Rasic to Jewell Harper (dated February 20, 1992), which provides guidance on obtaining approval for alternative monitoring plans.

- (b) Boilers 11-112E, 28-186N, 30-2726S, and 70-2722W are not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because they were constructed prior to the June 9, 1989 applicability date.
- (c) Boilers 11-112E, 28-186N, 30-2726S, and 70-2722W are not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators For Which Construction is Commenced after August 17, 1971 (326 IAC 12) because they were constructed prior to the August 17, 1971 applicability date and have maximum heat input capacities less than 250 MMBtu per hour.
- (d) Boilers 11-112E, 28-186N, 30-2726S, and 70-2722W are not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because they were constructed prior to the June 19, 1984 applicability date and have maximum heat input capacities less than 100 MMBtu per hour.
- (e) None of the boilers are subject to the requirements of 40 CFR 60, Subparts CCCC (Standards of Performance for New Stationary Sources: Commercial and Industrial Solid Waste Incineration Units) because they were constructed prior to the November 30, 1999 applicability date and do not meet the definition of a solid waste incinerator as stated in 40 CFR 60.2265, which defines solid waste incineration as "solid waste combustion in an enclosed device using controlled flame combustion without energy recovery..."
- (f) The boilers are not subject to the requirements of 40 CFR 64, Compliance Assurance Monitoring because none of the boilers are subject to an emission limit for which a control device is necessary to meet the limit.
- (g) Although boilers 28-186N, 30-2726S, and 70-2722W burn hazardous waste, they are not subject to the requirements of 40 CFR 63, Subpart EEE - National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors because they do not meet the definition of hazardous waste incinerators in 40 CFR 260.10. In 40 CFR 260.10, an incinerator is defined as:

"any enclosed device that: (1) uses controlled flame combustion and neither meets the criteria for classification as a boiler, sludge dryer, or carbon regeneration unit, nor is listed as an industrial furnace; or  
(2) Meets the definition of infrared incinerator or plasma arc incinerator."

In 40 CFR 260.10, a boiler is defined as:

"an enclosed device using controlled flame combustion and having the following characteristics:

- (i) The unit must have physical provisions for recovering and exporting thermal energy in the form of steam, heated fluids, or heated gases; and
- (ii) The unit's combustion chamber and primary energy recovery sections(s) must be of integral design. To be of integral design, the combustion chamber and the primary energy recovery section(s) (such as waterwalls and superheaters) must be physically formed into one manufactured or assembled unit; ... and

- (iii) While in operation, the unit must maintain a thermal energy recovery efficiency of at least 60 percent, calculated in terms of the recovered energy compared with the thermal value of the fuel; and
- (iv) The unit must export and utilize at least 75 percent of the recovered energy, calculated on an annual basis. In this calculation, no credit shall be given for recovered heat used internally in the same unit. (Examples of internal use are the preheating of fuel or combustion air, and the driving of induced or forced draft fans or feedwater pumps)."

Reilly has confirmed that boilers 28-186N, 30-2726S, and 70-2722W meet the definition of a boiler under 40 CFR 260.10 and are not subject to the requirements of 40 CFR 63, Subpart EEE.

- (ii) Boilers identified as 11-112E, 28-186N, 30-2726S, 70-2722W, CB600-300, CN5-400, and CB-70K are subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD because they are either existing affected large gaseous fuel-fired boilers or existing affected large liquid-fired boilers, as defined by 40 CFR 63.7506(b). The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to these process heaters after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. Boilers identified as 11-112E, CB600-300, and CN5-400 meet the criteria in the definition in 40 CFR 63.7575 for the large gaseous fuel subcategory. Boilers identified as 28-186N, 30-2726S, 70-2722W, and CB-70K meet the criteria in the definition in 40 CFR 63.7506(b) for the large liquid fuel subcategory. Pursuant to 40 CFR 63.7506(b), the only requirements that apply to boilers belonging to the large gaseous fuel subcategory and the large liquid fuel subcategory are the initial notification requirements in 40 CFR 63.9(b). The Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the date of publication of the final rule for 40 CFR 63, Subpart DDDDD in the Federal Register, as required by 40 CFR 63.7545(b).

#### **Federal Rule Applicability - Process Heaters**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12) applicable to the process heaters.

The process heaters are not subject to the requirements of 40 CFR 60, Subparts CCCC (Standards of Performance for New Stationary Sources: Commercial and Industrial Solid Waste Incineration Units) because they were constructed prior to the November 30, 1999 applicability date and do not meet the definition of a solid waste incinerator as stated in 40 CFR 60.2265, which defines solid waste incineration as "solid waste combustion in an enclosed device using controlled flame combustion without energy recovery... ."

None of the process heaters are subject to the requirements of 40 CFR 60, Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators For Which Construction is Commenced after August 17, 1971 (326 IAC 12) because they have maximum heat input capacities less than 250 MMBtu per hour and they are not steam generating units as defined in the rule.

None of the process heaters are subject to the requirements of 40 CFR 60, Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators For Which Construction is Commenced after August 17, 1971 (326 IAC 12) because they have maximum heat input capacities less than 250 MMBtu per hour and they are not steam generating units as defined in the rule.

None of the process heaters are subject to the requirements of 40 CFR 60, Subpart Db - Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating

Units (326 IAC 12) because they have maximum heat input capacities less than 100 MMBtu per hour.

None of the process heaters are subject to the requirements of 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12). Process heaters BX2707, BM2724W, BD2714V, EP2729Q, and 732714 are not subject to this NSPS because they were constructed prior to June 9, 1989. All of the other process heaters are not subject to this NSPS because they have maximum heat input capacities less than 10 MMBtu per hour applicability threshold.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to the process heaters.

The process heaters are not subject to the requirements of 40 CFR 63, Subpart EEE - National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors because they are not used to burn hazardous waste.

- (c) The process heaters are not subject to the requirements of 40 CFR 64, Compliance Assurance Monitoring because none of the heaters are subject to an emission limit for which a control device is necessary to meet the limit.

- (d) Process heaters identified as 722804, BXS2706Q, BS2740Q, BS2740Q, BT2728S, SB2710P and NB2720Q are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The process heaters identified as 722804, BXS2706Q, BS2740Q, BS2740Q, BT2728S, SB2710P and NB2720Q are part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575, because they have a rated capacity of less than or equal to 10 million British thermal units per hour heat input. Pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for the affected source for small gaseous fuel subcategory.

Process heaters identified as BX2707V, BM2724W, BD2714V, EP2729Q, and 732714 are subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The Process heaters identified as BX2707V, BM2724W, BD2714V, EP2729Q, and 732714 comprise one existing affected source for the large gaseous fuel subcategory, as defined by 40 CFR 63.7506(b), because they meet the criteria in the definition in 40 CFR 63.7575 for the large gaseous fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected sources after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. This rule is not yet published in the Federal Register. A copy of the signed, final rule is available at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

Pursuant to 40 CFR 63.7506(b), the only requirements that apply to the existing affected source for the large gaseous fuel subcategory are the initial notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the date of publication of the final rule for 40 CFR 63, Subpart DDDDD in the Federal Register, as required by 40 CFR 63.7545(b).

#### **Federal Rule Applicability - Plant 27**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12) applicable to Plant 27.

Plant 27 is not subject to the requirements of 40 CFR 60, Subpart VV - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals

Manufacturing Industry) (326 IAC 12) because this rule applies only to facilities constructed or modified after January 5, 1981.

Plant 27 is not subject to the requirements of 40 CFR 60, Subpart III – Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Process (326 IAC 12) because this plant

- (1) Does not have an air oxidation unit; and
- (2) Does not produce as a product, co-product, by-product, or intermediate any of the chemicals listed in 40 CFR 60.617

Plant 27 is not subject to the requirements of 40 CFR 60, Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12), because this plant does not produce any of the chemicals listed in 40 CFR 60.667 as a product, co-product, by-product, or intermediate.

Plant 27 is not subject to the requirements of 40 CFR 60, Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (326 IAC 12), because this plant does not produce any of the chemicals listed in 40 CFR 60.707 as a product, co-product, by-product, or intermediate.

Storage tanks T-260, T-261, T-262, and T-263 are not subject to 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12) because these tanks were constructed prior to July 23, 1984.

The storage tanks T-260, T-261, T-262, and T-263 are not subject to the requirements of the New Source Performance Standards 40 CFR 60, Subpart K or Ka (326 IAC 12) because these storage tanks are not used to store petroleum liquids as defined in 40 CFR 60.111(b) and 40 CFR 60.111a(b).

- (b) Plant 27 is subject to the requirements of 40 CFR 63, Subpart F (National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry) (326 IAC 20-11), 40 CFR 63, Subpart G (National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater) (326 IAC 20-11), and 40 CFR 63, Subpart H (National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks) (326 IAC 20-12). These NESHAP apply to chemical manufacturing process units that meet the following three criteria:

- (1) Manufacture as a primary product one or more of the chemicals listed in Table 1 of 40 CFR 63, Subpart F, tetrahydrobenzaldehyde, and/or crotonaldehyde.

Plant 27 is used to manufacture pyridine and b-picoline, which are both listed in Table 1 of 40 CFR 63, Subpart F.

- (2) Use as a reactant or manufacture as a product or co-product, one or more of the organic hazardous air pollutants listed in Table 2 of 40 CFR 63, Subpart F.

Plant 27 uses the following chemicals as reactants: acetaldehyde, propionaldehyde, formaldehyde, and benzene. All of these chemicals are listed in Table 2 of 40 CFR 63, Subpart F.

- (3) Are located at a plant site that is a major source of HAPs as defined in Section 112(a) of the CAA.

This source was a major source of HAPs in April 1997 (i.e., the compliance date of these NESHAP).

Plant 27 meets the definition of an existing source under 40 CFR 63, Subparts F, G, and H because it was constructed prior to December 31, 1992 and has not been modified or reconstructed since that date.

40 CFR 63, Subparts F and G contain requirements for process vents, storage tanks, heat exchange systems, transfer operations, maintenance wastewater, and process wastewater.

Process Vents: Affected process vents located at Plant 27 include the Box Plant Vent Tank, DAB Plant Vent Tank, and Continuous Stills. For this NESHAP, process vents are categorized as either Group 1 or Group 2 process vents. A Group 1 process vent is defined in 40 CFR 63.111 as a process vent for which the vent stream flow rate is greater than or equal to 0.005 standard cubic meter per minute, the total organic HAP concentration is greater than or equal to 50 parts per million by volume, and the total resource effectiveness (TRE) index value is less than or equal to 1.0. In Plant 27, only the Box Plant Vent tank meets the Group 1 process vent definition. The DAB Plant Vent Tank and Continuous Stills process vents meet the Group 2 process vent definition in 40 CFR 63.111, which is defined as a process vent for which the vent stream flow rate is less than 0.005 standard cubic meter per minute, the total organic HAP concentration is less than 50 parts per million by volume or the TRE index value is greater than 1.0. The DAB Plant Vent tank process vent has a flow rate greater than or equal to 0.005 standard cubic meter per minute, a total organic HAP concentration greater than or equal to 50 ppm by volume and a TRE index value is greater than 1.0 but less than 4.0. The Continuous Stills process vent is a Group 2 process vent with a TRE index value greater than 4.0. Although the DAB Plant Vent Tank meets the definition of a Group 2 process vent, Reilly manages this process vent as a Group 1 process vent. None of the process vents are used to discharge halogenated vent streams as defined in 40 CFR 63.111 and none of the vents discharge to either an off-site control or an on-site control not owned or operated by Reilly.

For the Group 1 process vents (including the DAB Plant Vent Tank), Reilly complies with the 20 ppm limit in 40 CFR 63.113(a)(2) using process heaters of less than 44 megawatts. Pursuant to 40 CFR 63.113(b), the vent streams from the Group 1 process vents must be introduced into the flame zone of the process heaters. Reilly must also comply with the monitoring requirements in 40 CFR 63.114(a)(3), (d), and (e); and the recordkeeping and reporting requirements for Group 1 process vents in 40 CFR 63.117 and 40 CFR 63.118. Pursuant to 40 CFR 63.115(b), Reilly is not required to conduct performance tests for the process heaters because they have design heat input capacities less than 44 megawatts.

For the Group 2 process vent (the Continuous Stills), Reilly must comply with 40 CFR 63.113(e), which requires the TRE index value be greater than 4.0. TRE index value must be calculated using the provisions in 40 CFR 63.115. In addition to this requirement, Reilly must also comply with the reporting and recordkeeping provisions in 40 CFR 63.117(b) and 63.118(c) and (h). The Group 2 process vent is not subject to the monitoring requirements in 40 CFR 63.114 through 40 CFR 63.118.

Storage Tanks: Affected storage tanks are defined in 40 CFR 63.101 as a tank or other vessel that is used to store organic liquids that contain one or more of the organic HAPs listed in Table 2 of 40 CFR 63, Subpart F and is assigned to a chemical manufacturing process unit subject 40 CFR 63, Subpart F. Affected storage vessels do not include vessels permanently attached to motor vehicles; pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere; vessels with capacities smaller than 38 cubic meters (10,038 gallons); vessels storing organic

hazardous air pollutants only as impurities; bottoms receiver tanks; surge control vessels; or wastewater tanks.

Plant 27 has several storage tanks used to store organic HAPs: Tanks T-260 and T-261 are used to store propionaldehyde; tanks T-262 and T-263 are used to store acetaldehyde; tanks T-200, T-201, and T-202 are used to store formaldehyde; and tank T-254 and several smaller tanks (with capacities less than 10,000 gallons) used to store benzene. Storage vessels T-260, T-261, T-262, and T-263 are not subject to the requirements of 40 CFR 63, Subparts F, G, and H because they are pressurized storage vessels.

The benzene storage tanks with capacities less than 10,000 gallons are not subject to 40 CFR 63, Subpart F, G, and H. Benzene storage tank T-254 is subject to both 40 CFR 63, Subpart G and 40 CFR 61, Subpart Y. Under 40 CFR 63, Subpart G, tank T-254 meets the definition of a Group 2 storage tank because it has a storage capacity less than 75 cubic meters (19,812 gallons) and is used to store a liquid with a maximum true vapor pressure 13.1 kPa. Pursuant to 40 CFR 63.110(a)(3), storage tank T-254 is required to comply only with the provisions in 40 CFR 61, Subpart Y (see Federal Rule Section on benzene storage tanks for applicable requirements).

The formaldehyde storage tanks T-200, T-201 and T-202 each have capacities of 47,000 gallons and are not pressurized. Although these storage tanks each have capacities greater than 151 cubic meters (40,000 gallons), the vapor pressure of formaldehyde is less than 5.2 kilopascals. Therefore, these tanks meet the definition of Group 2 storage vessels. Pursuant to 40 CFR 63.119(a)(3), the Permittee must comply with the recordkeeping requirements in 40 CFR 63.123(a) for the formaldehyde storage vessels. These storage vessels are not subject to any other requirements of 40 CFR 63.119 through 63.123.

Heat Exchange Systems: Plant 27 has three recirculating heat exchange systems, which are identified as the Box Plant South, Box Plant North, and the DAB Plant heat exchange systems. Pursuant to 40 CFR 63.104(b), Reilly is required to monitor the cooling water for the presence of one or more organic hazardous air pollutant whose presence in the cooling water would indicate a leak in heat exchange system. The water is monitored for total hazardous air pollutants, total volatile organic compounds, total organic carbon, or other speciated HAP compounds that would indicate a leak in the heat exchange system. The heat exchange system is monitored on a quarterly basis. The speciated hazardous air pollutants or total hazardous air pollutants refer to the hazardous air pollutants listed in Table 4 of 40 CFR 63, Subpart F. The samples are collected and tested in accordance with the requirement in 40 CFR 63.104(b)(4) and (b)(3), respectively. If leak is detected, it must be repaired as soon as practical but not later than 45 days, except as allowed by 40 CFR 63.104(e). The Permittee must also comply with the recordkeeping requirements in 40 CFR 63.104(f)(1) and the reporting requirements in 40 CFR 63.104(f)(2).

Transfer Operations: Although Reilly uses loading racks to fill tank trucks and railcars with pyridine and b-picoline, the loading racks are not subject to the requirements of 40 CFR 63, Subparts F, G, H, and XX. Subpart XX does not apply because the Permittee does not operate an ethylene production facility. Subparts F, G, and H do not apply because the loading racks do not meet the definitions in 40 CFR 63.101 and they are equipped with a vapor balance system (see 40 CFR 63.100(f)(10)). For the purposes of 40 CFR 63, Subparts F and G, a transfer operation is defined in 40 CFR 63.101 as "the loading, into a tank truck or railcar, of organic liquids that contain one or more the organic hazardous air pollutants listed in Table 2 ..." Pyridine and b-picoline are not listed in Table 2 of 40 CFR 63, Subpart F. A transfer rack is defined in 40 CFR 63.101 as "the collection of loading arms and loading hoses, at a single loading rack, that are assigned to a chemical manufacturing process unit subject to this subpart...and are used to fill tank trucks and/or railcars with organic liquid that contain one or more of the organic hazardous air pollutants listed in Table 2... . Transfer rack does not include: (1) Racks, arms, or hoses that only transfer liquids containing organic hazardous air pollutants as impurities; or Racks, arms, or hoses that vapor balance during all loading operations..."

Maintenance Wastewater: For maintenance wastewater, the Permittee must comply with the requirements of 40 CFR 63.105, which requires the source to prepare a description of procedures for managing maintenance wastewater. The description must include maintenance procedures for managing wastewater generated from emptying and purging equipment during temporary shutdowns that are necessary for inspections, maintenance, and repair (i.e., maintenance turnaround) and during periods which are not shutdowns (i.e., routine maintenance). The description must specify the process equipment and/or maintenance tasks that are expected to create wastewater during maintenance activities; the procedure for properly managing the wastewater and controlling HAP emissions to the atmosphere; and the procedures for cleaning materials from process equipment.

Process Wastewater: Plant 27 consists of two wastewater streams, identified as 140 Bottoms and 75 Flow, which meet the definition of a Group 2 wastewater stream in 40 CFR 63.111. There are not wastewater streams meeting the definition of Group 1 wastewater streams as defined in 40 CFR 63.111. The Group 2 wastewater streams are not required to comply with the control requirements in 40 CFR 63.132 through 40 CFR 63.139. Pursuant to 40 CFR 63.132(a)(3), Group 2 wastewater streams must maintain records as specified in 40 CFR 63.147(b)(8).

40 CFR 63, Subpart H contains requirements for equipment leaks.

Equipment Leaks: Plant 27 has pumps, pressure relief valves, open-ended valves, surge control vessels, closed vent systems, bottoms receivers, and connectors that are subject to the requirements of 40 CFR 63, Subpart H. Reilly must comply with the following applicable requirements: 40 CFR 63.162 (Standards: General), 40 CFR 63.163 (Standards: Pumps in light liquid service); 40 CFR 63.165 (Standards: Pressure relief devices in gas/vapor service); 40 CFR 63.167 (Standards: Open-ended valves or lines); 40 CFR 63.168 (Standards: Valves in gas/vapor service and in light liquid service); 40 CFR 63.169 (Standards: Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service); 40 CFR 63.170 (Standards: Surge control vessels and bottoms receivers); 40 CFR 63.171 (Standards: Delay of Repair); 40 CFR 63.172 (Standards: Closed-vent systems and control devices); 40 CFR 63.174 (Standards: Connectors in gas/vapor service and in light liquid service); 40 CFR 63.175 (Quality Improvement Program for Valves); 40 CFR 63.176 (Quality Improvement Program for Pumps); 40 CFR 63.180 (Test Methods and Procedures); 40 CFR 63.181 (Recordkeeping Requirements); and 40 CFR 63.182 (Reporting Requirements).

- (c) Plant 27 is subject to 40 CFR 61, Subpart J – National Emission Standard for Equipment Leaks (Fugitive Emissions Sources) of Benzene (326 IAC 14) and 40 CFR 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) (326 IAC 14) because these NESHAP apply to pumps, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, control vessels, bottoms receivers and control devices that operate in benzene and/or volatile HAP service. Since all of the equipment subject to these NESHAP are also subject to the requirements of 40 CFR 63, Subpart H, the Permittee must comply only with the requirements of 40 CFR 63, Subpart H as provided in 40 CFR 63.160(b)(2).
- (d) Plant 27 is not subject to the requirements of 40 CFR 63, Subpart I – National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks because this plant does not manufacture any of the materials listed in 40 CFR 63.190(b)(1) through (b)(6).
- (e) The cooling towers located at Plant 27 are not subject to the requirements of 40 CFR 63, Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers (326 IAC 20-4) because this rule applies only to cooling towers operated with chromium-based water treatment chemicals. Reilly does not use chromium-based water treatment chemicals in its cooling towers.

- (f) Plant 27 is not subject to 40 CFR 63, Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards because this plant does not manufacture any of the following categories of chemicals: acetal resins; acrylic and modacrylic fibers; carbon black; cyanide chemicals; ethylene; hydrogen fluoride; polycarbonates; and spandex.
- (g) Plant 27 is not subject to the requirements of 40 CFR 63, Subpart I – National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks because this plant does not manufacture any of the materials listed in 40 CFR 63.190(b)(1) through (b)(6).

#### **Federal Rule Applicability - Plant 40**

- (a) There are not New Source Performance Standards applicable to Plant 40.

Plant 40 is not subject to the requirements of 40 CFR 60, Subpart VV – Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (326 IAC 12) because this plant was constructed prior to January 5, 1981 and was not modified after that date.

Plant 40 is not subject to the requirements of 40 CFR 60, Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12) because this plant does not produce any of the chemicals listed in 40 CFR 60.667 as a product, co-product, by-product, or intermediate.

Plant 40 is not subject to the requirements of 40 CFR 60, Subpart III – Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes (326 IAC 12) because this plant does produce as a product, co-product, by-product, or intermediate any of the chemicals listed in 40 CFR 60.617.

Plant 40 is not subject to the requirements of 40 CFR 60, Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (326 IAC 12), because this plant does not produce any of the chemicals listed in 40 CFR 60.707 as a product, co-product, by-product, or intermediate.

- (b) Plant 40 is subject to the requirements of 40 CFR 61, Subpart J - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene because this plant includes pumps, open-ended valves and lines, valves, and connectors “in benzene service” as that term is defined in 40 CFR 61.111. Pursuant to 40 CFR 61.112(a), facilities subject to this NESHAP must comply with the requirements of 40 CFR 61 Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources). Specifically, the pumps must be operated in compliance with the requirements of 40 CFR 61.242-2, open-ended valves and lines must be operated in compliance with 40 CFR 61.242-6, and valves must be operated in compliance with 40 CFR 61.242-7.
- (c) Plant 40 is not subject to the requirements of 40 CFR 63, Subpart F, G, and H – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry. To be subject to the requirements of these NESHAP, the plant must consist of chemical manufacturing process units that meet all of the criteria in 40 CFR 63.100(b)(1), (b)(2) and (b)(3). Since this plant is used to manufacture vinyl pyridine, which is not one of the chemicals listed in Table 1 of 40 CFR 63, Subpart F or in 40 CFR 63.100(b)(1)(i) and (b)(1)(ii), the plant is not subject to the requirements of these NESHAP.
- (d) Plant 40 is not subject to the requirements of 40 CFR 63, Subpart I – National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the

Negotiated Regulation for Equipment Leaks because this plant does not manufacture any of the materials listed in 40 CFR 63.190(b)(1) through (b)(6).

- (e) Plant 40 is not subject to 40 CFR 63, Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards because this plant does not manufacture any of the following categories of chemicals: acetal resins; acrylic and modacrylic fibers; carbon black; cyanide chemicals; ethylene; hydrogen fluoride; polycarbonates; and spandex.

#### **Federal Rule Applicability – Plant 41**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12) applicable to Plant 41.
- (b) Plant 41 is not subject to the requirements of 40 CFR 60, Subpart VV - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry) (326 IAC 12) because this rule applies only to facilities constructed or modified after January 5, 1981.
- (c) Plant 41 is not subject to the requirements of 40 CFR 60, Subpart III – Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Process (326 IAC 12) because this plant
  - (1) Does not have an air oxidation unit; and
  - (2) Does not produce as a product, co-product, by-product, or intermediate any of the chemicals listed in 40 CFR 60.617
- (d) Plant 41 is not subject to the requirements of 40 CFR 60, Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12), because this plant does not produce any of the chemicals listed in 40 CFR 60.667 as a product, co-product, by-product, or intermediate.
- (e) Plant 41 is not subject to the requirements of 40 CFR 60, Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (326 IAC 12), because this plant does not produce any of the chemicals listed in 40 CFR 60.707 as a product, co-product, by-product, or intermediate.
- (f) Plant 41 is not subject to the requirements of 40 CFR 63, Subpart F, G, and H – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry. To be subject to the requirements of these NESHAP, the plant must consist of chemical manufacturing process units that meet all of the criteria in 40 CFR 63.100(b)(1), (b)(2) and (b)(3). Since Plant 41 does not manufacture any of the chemicals listed in Table 1 of 40 CFR 63, Subpart F or in 40 CFR 63.100(b)(1)(i) and (b)(1)(ii), it is not subject to the requirements of these NESHAP.
- (g) Plant 41 is not subject to 40 CFR 63, Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards because this plant does not manufacture any of the following categories of chemicals: acetal resins; acrylic and modacrylic fibers; carbon black; cyanide chemicals; ethylene; hydrogen fluoride; polycarbonates; and spandex.
- (h) Plant 41 is not subject to the requirements of 40 CFR 63, Subpart I – National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks because this plant does not manufacture any of the materials listed in 40 CFR 63.190(b)(1) through (b)(5) and does not use carbon tetrachloride or methylene chloride.

- (i) Plant 41 is subject to 40 CFR 61, Subpart J – National Emission Standard for Equipment Leaks (Fugitive Emissions Sources) of Benzene (326 IAC 14) and 40 CFR 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) (326 IAC 14) because these NESHAP apply to pumps, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, control vessels, bottoms receivers and control devices that operate in benzene and/or volatile HAP service. Since all of the equipment subject to these NESHAP are also subject to the requirements of 40 CFR 63, Subpart GGG, the Permittee must comply only with the requirements of 40 CFR 63, Subpart GGG as provided in 40 CFR 63.1255(a)(2).
- (j) Plant 41 is not subject to 40 CFR 63, Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards because this plant does not manufacture any of the following categories of chemicals: acetal resins; acrylic and modacrylic fibers; carbon black; cyanide chemicals; ethylene; hydrogen fluoride; polycarbonates; and spandex.
- (k) Plant 41 is subject to the requirements of 40 CFR 63, Subpart GGG – National Emission Standards for Pharmaceuticals Production. This NESHAP is applicable to pharmaceutical manufacturing operations located at Plant 41 because they:
  - (1) Manufacture a pharmaceutical product as defined in 40 CFR 63.1251;
  - (2) Are located at a plant site that is a major source as defined in Section 112(a) of the Clean Air Act; and
  - (3) Process, use, or produce HAP.

Plant 41 is an existing source because:

- (1) This facility was constructed prior to April 2, 1997 and has not been reconstructed; and
- (2) No new pharmaceutical manufacturing process units (PMPUs) dedicated to manufacturing a single product that has the potential to emit 10 tons per year of any one HAP or 25 tons per year of combined HAP was constructed after April 2, 1997 or reconstructed after October 21, 1999.

Plant 41 is subject to the standards in 40 CFR 63.1252 and 40 CFR 63.1254; the monitoring and compliance determination requirements in 40 CFR 63.1258; the equipment leak standards in 40 CFR 63.1255; the recordkeeping requirements in 40 CFR 63.1259; and the reporting requirements in 40 CFR 63.1260.

The following requirements are not applicable:

- (A) The wastewater located at this source is not associated with an individual pharmaceutical manufacturing process unit (PMPU) and is not located at the source for the purpose of manufacturing pharmaceutical products. Therefore, the requirements of 40 CFR §63.1256 (Wastewater Standards) do not apply to the source.
- (B) There are no inspection requirements under 40 CFR 63.1258(h) applicable to this source.

#### **Federal Rule Applicability – Plant 38 and the Niacinamide Packaging Unit**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12) applicable to Plant 38.

- (b) Plant 38 is not subject to the requirements of 40 CFR 60, Subpart VV - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry) (326 IAC 12) because this rule applies only to facilities constructed or modified after January 5, 1981.
- (c) Plant 38 is not subject to the requirements of 40 CFR 60, Subpart III – Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Process (326 IAC 12) because this plant
  - (1) Does not have an air oxidation unit; and
  - (2) Does not produce as a product, co-product, by-product, or intermediate any of the chemicals listed in 40 CFR 60.617
- (d) Plant 38 is not subject to the requirements of 40 CFR 60, Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12), because this plant does not produce any of the chemicals listed in 40 CFR 60.667 as a product, co-product, by-product, or intermediate.
- (e) Plant 38 is not subject to the requirements of 40 CFR 60, Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (326 IAC 12), because this plant does not produce any of the chemicals listed in 40 CFR 60.707 as a product, co-product, by-product, or intermediate.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 40 CFR 63, 326 IAC 14 and 326 IAC 20) applicable to this facility.
- (g) Plant 38 is not subject to the requirements of 40 CFR 63, Subpart F, G, and H – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry. To be subject to the requirements of these NESHAP, the plant must consist of chemical manufacturing process units that meet all of the criteria in 40 CFR 63.100(b)(1), (b)(2) and (b)(3). Since Plant 38 does not manufacture any of the chemicals listed in Table 1 of 40 CFR 63, Subpart F or in 40 CFR 63.100(b)(1)(i) and (b)(1)(ii), it is not subject to the requirements of these NESHAP.
- (h) Plant 38 is not subject to 40 CFR 63, Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards because this plant does not manufacture any of the following categories of chemicals: acetal resins; acrylic and modacrylic fibers; carbon black; cyanide chemicals; ethylene; hydrogen fluoride; polycarbonates; and spandex.
- (i) Plant 38 is not subject to the requirements of 40 CFR 63, Subpart I – National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks because this plant does not manufacture any of the materials listed in 40 CFR 63.190(b)(1) through (b)(5) and does not use carbon tetrachloride or methylene chloride.
- (j) Plant 38 is not subject to the requirements of 40 CFR 61, Subpart J – National Emission Standard for Equipment Leaks (Fugitive Emissions Sources) of Benzene (326 IAC 14). This NESHAP applies only to pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, control vessels, bottoms receivers and control devices that operate in benzene service. Since benzene is not used at Plant 38, 40 CFR 61, Subpart J does not apply.
- (k) Plant 38 is not subject to the requirements of 40 CFR 63, Subpart GGG – National Emission Standards for Pharmaceuticals Production. This NESHAP is applicable to pharmaceutical manufacturing operations that:

- (1) Manufacture a pharmaceutical product as defined in 40 CFR 63.1251;
- (2) Are located at a plant site that is a major source as defined in Section 112(a) of the Clean Air Act; and
- (3) Process, use, or produce HAP.

Since Plant 38 does not process, use or produce hazardous air pollutants, it is not subject to 40 CFR 63, Subpart GGG.

#### **Federal Rule Applicability – Plants 47 and 48**

- (a) The waste gas incinerator located at Plant 47 is not subject to the requirements of 40 CFR 60, Subpart E – Standards of Performance for Incinerators (326 IAC 12) because this incinerator does not burn solid waste. This incinerator doesn't meet the definition of an incinerator in 40 CFR 60.50.
- (b) The waste gas incinerator located at Plant 47 is not subject to the requirements of 40 CFR 60, Subpart CCCC – Standards for Performance for Commercial and Industrial Solid Waste Incineration Units because it was constructed in 1979, which is prior to 1999.
- (c) The waste gas incinerator located at Plant 47 is not subject to the requirements of 40 CFR 60, Subpart EEE – National Emission Standards for Hazardous Air Pollutants for Hazardous Waste Combustors because it does not burn hazardous waste.
- (e) Plants 47 and 48 are not subject to 40 CFR 60, Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (326 IAC 12) because these plants do not make any of the chemicals listed in 40 CFR 60.707 as a product, co-product, by-product or intermediate.
- (f) Plants 47 and 48 are not subject to 40 CFR 60, Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12) because these plants do not make any of the chemicals listed in 40 CFR 60.667 as a product, co-product, by-product or intermediate.
- (f) Plants 47 and 48 are not subject to 40 CFR 60, Subpart III – Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes (326 IAC 12) because these plants do not make any of the chemicals listed in 40 CFR 60.617 as a product, co-product, by-product or intermediate.
- (g) Plants 47 and 48 are not subject to the requirements of 40 CFR 60, Subpart VV – Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (326 IAC 12) because these plants were constructed prior to January 5, 1981 and have not undergone any modifications as defined in 40 CFR 60.14.
- (h) Plants 47 and 48 are not subject to the requirements of 40 CFR 61, Subpart J – National Emission Standard for Equipment Leaks (Fugitive Emissions Sources) of Benzene (326 IAC 14). This NESHAP applies only to pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, control vessels, bottoms receivers and control devices that operate in benzene service. Since benzene is not used at Plants 47 and 48, 40 CFR 61, Subpart J does not apply.
- (i) Plants 47 and 48 are not subject to the requirements of 40 CFR 63, Subpart F, G, and H – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry. To be subject to the requirements of these

NESHAP, a plant must consist of chemical manufacturing process units that meet all of the criteria in 40 CFR 63.100(b)(1), (b)(2) and (b)(3). Since Plants 47 and 48 do not manufacture any of the chemicals listed in Table 1 of 40 CFR 63, Subpart F or in 40 CFR 63.100(b)(1)(i) and (b)(1)(ii), they are not subject to the requirements of these NESHAP.

- (j) Plants 47 and 48 are not subject to the requirements of 40 CFR 63, Subpart I – National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks because these plants do not manufacture any of the materials listed in 40 CFR 63.190(b)(1) through (b)(6).
- (k) Plants 47 and 48 are not subject to 40 CFR 63, Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards because these plants do not manufacture any of the following categories of chemicals: acetal resins; acrylic and modacrylic fibers; carbon black; cyanide chemicals; ethylene; hydrogen fluoride; polycarbonates; and spandex.

### **Federal Rule Applicability - Wastewater Treatment Plant**

- (a) The Wastewater Treatment Plant is subject to the requirements of 40 CFR 63, Subpart DD (National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations) because this source is a major source of hazardous air pollutants as defined in 40 CFR 63.2 and the Wastewater Treatment Plant treats wastewater from an adjacent source not operated by the Permittee. The Permittee submitted the Initial Notification and the Notification of Compliance Status required by 40 CFR 63.9 on February 19, 1998 and February 16, 2000, respectively. Since the average volatile organic hazardous air pollutant (VOHAP) concentration of the off-site material is less than 500 parts per million by weight (ppmw) at the point of delivery, Reilly is not required to comply with the standards for off-site material treatment in §63.684 or the standards for tanks, separators, surface impoundments, containers, and transfer systems in §63.685 through 63.689. Pursuant to 40 CFR 63.683(b)(1)(iii) and 63.683(c)(ii) (Standards: General), Reilly determined the average VOHAP concentration of the off-site material are less than the 500 ppm threshold. The average VOHAP concentration of 194 ppmw was determined using the methods specified in §63.694(b). As required by §63.683(b)(1)(iii) and §63.683(c)(ii), the Permittee will review and update this determination at least once every calendar year. The Permittee is also not subject to the equipment leak requirements in §63.691(a) because there are no components which contact waste streams with equal to or greater than 10 percent total HAP concentration by weight (see §63.680(c)(3)). To demonstrate compliance with this subpart, the source must maintain records of the initial and subsequent analysis of off-site wastewater.
- (b) The sludge dryer is subject to the requirements of 40 CFR 61, Subpart E (National Emissions Standards for Mercury) (326 IAC 14) because this rule applies to dryers used to dry sludge produced by a treatment plant that processes industrial wastewater. The sludge dryer has not been operated for several years due to the high cost of natural gas compared with the costs of offsite disposal. However, Permittee has stated that the sludge dryer may be used in the future if the economic situation alters. For this reason, the mercury emission standard in §61.52(b), the sludge sampling requirements in §61.54, and the monitoring requirements in §61.55(a) have been included in the draft permit.
- (c) The Wastewater Treatment Plant is not subject to the requirements of 40 CFR 60, Subpart O (Standards of Performance for Sewage Treatment Plants) because this NSPS is applicable to incinerators that combust wastes containing sewage from municipal sewage treatment plants. The Permittee plant does not have an incinerator that burns sewage from a municipal sewage treatment plant.
- (d) The wastewater collection and treatment system is subject to the requirements of 40 CFR 61, Subpart FF (National Emission Standard for Benzene Waste Operations) because this rule applies to chemical manufacturing plants. Based on information provided by the source, the total annual benzene quantity from facility waste is less than 11 tons per year.

Therefore, the source is exempt from the requirements §61.342(b) and (c). The source is subject to the compliance provisions in §61.355, the recording keeping requirements in §61.356, and the reporting requirements in §61.357.

**Federal Rule Applicability – Benzene Storage Tank 254 and the following storage tanks identified as:**

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
Plant 26	2600	2,961	1974
	26007	2,961	1974
	2601	2,961	1974
	2602	2,961	1974
	2604A	3,948	1983
	2605A	1,763	1980
	2606A	1,763	1980
	2607	1,316	1980
	2608	1,316	1980
	2609A	2,133	1980
	2610	2,133	1980
	26101A	2,133	1980
	26102C	2,133	1980
	26103A	2,133	1980
	26104A	2,133	1980
	2611A	2,133	1982
	2612A	2,133	1982
	2613	2,133	1978
	2614	2,133	1978
	2615	2,133	1980
	2616	2,133	1980
	2617	2,133	1980
	2618A	6,792	1980
	26199	846	1980
	2619A	564	1980
	2620A	2,538	1980
	2621A	2,538	1980
	2622A	2,538	1980
	2623A	6,792	1980
	2624	6,792	1980
	2625	6,792	1980
	26266A	2,138	1980
	2626B	2,138	1980
	2628	3,305	1980
	26299	846	1980
	2630A	2,961	1974
	2631A	2,961	1974
	2632A	2,961	1974
	2633	2,961	1974
	2634A	2,961	1974
	2635A	2,961	1974
	2636	2,961	1974
	2637	6,792	1974
	2638	7,614	1974
	2639	7,614	1974
	2640	7,614	1974
	2641A	4,888	1980
2642A	4,888	1980	
2643A	4,888	1980	
2644	7,614	1974	
2646	3,760	1980	
2649	9,400	1995	
2693A	881	1980	
2694	1,269	NA	
2696	1,469	1980	
2697	1,469	1980	
2698A	1,469	1980	
Plant 27	212	6,169	1980
	233	7,638	1980
	234	7,638	1980

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
	257	2,979	1980
	271	8,813	1980
	272	8,813	1980
	273	8,813	1980
	299	5,264	1980
	457	4,888	1993
	458	4,888	1993
	600	6,169	1973
	699	5,264	1973
Plant 38	501	5,200	1981
	502	5,200	1981
	506	5,200	1980
	507	5,200	1980
	508	5,200	1981
	509	5,200	1981
	516	5,200	1970
	517	5,200	1980
	518	5,200	1970
Plant 40	300	2,221	1980
	301	2,221	1980
	302	6,169	1995
	303	6,169	1984
	304	6,169	1984
	311A & C	2,056	1980
	311B	1,542	1980
	312	6,169	1980
	313	6,169	1980
	314	6,169	1980
	362	2,133	NA
	368	5,875	1989
	370	2,327	NA
	371	4,512	1980
	399	6,169	NA
Plant 41	21	5,585	1980
	23	2,735	NA
	24	2,735	NA
	25	2,003	NA
	26	2,009	1980
	38	5,949	1980
	43	6,169	1980
	44	6,169	1980
	45	6,169	1980
	46	6,169	1980
	47	6,169	1980
	48	6,169	1980
	56	9,988	NA
	57	8,065	1980
	211	6,169	1980
	213	6,169	1980
	214	6,169	1980
	236	7,820	1980
	298	1,269	1980
299	5,264	NA	
Plant 47	514	2,115	1980
	710	4,402	1981
	711	4,402	1981
	712	7,638	1980
	714	7,826	1981
	750	3,455	1979
	751	3,455	1979
	752	3,455	1979
	753	3,455	1979
	754	3,455	1979
	755	3,455	1979
	756	3,455	1979
	757	3,455	1979
758	3,455	1979	
759	3,455	1979	

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
	760	3,455	1979
	761	3,455	1979
	762	3,455	1979
	763	3,455	1979
	764	3,455	1979
	766	6,363	1979
	770	6,363	1979
	771	6,363	1979
	772	8,531	1991
	780	6,363	NA
	781	6,363	1991
	785	3,455	1979
<b>Plant 48</b>	405	5,182	1972
	406	5,182	1972
	540	6,463	1988
	541	6,463	1988
	542	6,463	1972
	543	6,463	1972
	545	6,463	1972
	546	6,463	1972
	547	6,463	1972
	548	6,463	1988
	550	6,463	1972
	551	6,463	1972
	552	6,463	1972
	553	6,463	1972
	556	6,463	1980
	557	6,463	1980
	558	9,342	1980
	599	1,904	1980
<b>Wastewater Treatment Plant</b>	4923	3,995	1991
	4929	8,813	1991
	116	1,692	1991

NA – Construction date unknown.

- (a) Tank 254 and storage tanks listed above with capacities less than 75 cubic meters (19,183 gallons) are not subject to 40 CFR 60, Subpart Kb, because of their capacities.  
  
Storage tanks listed in the table above that have construction dates after July 23, 1984 are not subject to 40 CFR 60, Subpart Kb because these tanks have storage capacities less than 40 cubic meters (10,267 gallons).
- (b) Storage tanks listed in the table above that have construction dates after May 19, 1978 and before July 23, 1984 are not subject to 40 CFR Part 60 Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 19, 1978, and Prior to July 23, 1984 (326 IAC 12) because the storage capacity of each tank is less than 40,000 gallons.
- (c) Storage tanks listed in the table above that have construction dates after June 11, 1973 and before May 19, 1978 are not subject to 40 CFR Part 60 Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 (326 IAC 12) because the storage capacity of each tank is less than 40,000 gallons.
- (d) The storage tanks listed in the table above that have construction dates prior to June 11, 1973 are not subject to the requirements of the New Source Performance Standards 40 CFR 60, Subpart K, Ka, or Kb (326 IAC 12) because these storage tanks were constructed prior to the applicability dates of these New Source Performance Standards.
- (e) Although the construction dates of storage tanks 2694, 362, 370, 399, 23, 24, 25, 56, 299, and 780 are unknown, these storage tanks would not be subject to the requirements of the New Source Performance Standards 40 CFR 60, Subpart K, Ka, or Kb (326 IAC

- 12) even if constructed during appropriate applicability dates because these storage tanks have storage capacities less than 10,000 gallons.
- (f) Storage tanks T-254 and the tanks listed in the table above are subject to the requirements of 40 CFR 61, Subpart Y - National Emission Standard for Benzene Storage Vessels (326 IAC 14) because these storage vessels are used to store liquid having a specific gravity within the range of specific gravities specified in ASTM D836-84 for Industrial Grade Benzene, ASTM D835-85 for Refined Benzene-485, ASTM D2359-85a or 93 for Refined Benzene-535, and ASTM D4734-87 or 96 for Refined Benzene-545. Storage tanks listed in the table above are required to comply only with the record keeping requirements in 40 CFR 61.476(b) because each tank has a storage capacity less than 38 cubic meters (10,000 gallons). These records include dimensions and the storage capacity of the tank. Storage tank T-254, which has a storage capacity greater than 10,000 gallons, uses a fixed roof with internal floating roof and double seals to comply with the standards in 40 CFR 61.271. For this storage vessel, the Permittee is required to comply with the inspection requirements in 40 CFR 61.272(a); the record keeping requirements in 40 CFR 61.276(a); and submit a periodic report as required by 40 CFR 61.475(a). Note that storage tank T-254 is also subject to 40 CFR 63, Subpart G; however, compliance with 40 CFR 63, Subpart Y satisfies the requirements of 40 CFR 63, Subpart G.
- (g) The source is not subject to the requirements of 40 CFR 61, Subpart BB – National Emission Standard for Benzene Emissions from Benzene Transfer Operations (326 IAC 14) because this source does not load benzene into tank trucks, railcars, or marine vessels and is not a benzene production facility or bulk terminal.

#### **Federal Rule Applicability - Storage Tanks not used to store benzene**

- (a) The tank identified as 2969 is subject to the requirements of 40 CFR 60, Subpart Kb, and must comply with the requirements of 40 CFR 60.112b, 60.113b, 60.115b, and 60.116b. The storage tanks listed below are not subject to 40 CFR 60 Subpart Kb:
- (1) Tanks 11, 30, 33, 35, 2647, 2650, 2651, 305, 366, 367, 37, 536, 537, 538, 4927, 107, 110, and T-101 because they have storage capacities less than 75 cubic meters (19,813 gallons);
  - (2) Tanks 118, 359, 360, 372, 373, 225, 235, and 797 because these storage tanks have capacities greater than 75 cubic meters (19,813 gallons) but less than 151 cubic meters (39,890 gallons) and are used to store liquids with a maximum vapor pressure of 2.2 psia; and
  - (3) Tank CL-101 because this storage tank has a capacity greater than 151 cubic meters (39,890 gallons) and is used to store liquids with maximum vapor pressures less than 0.5 psia.
- (b) Although constructed after July 23, 1984, tank 798 (located at Plant 47) and tank 2648 (located at Plant 26) are not subject to 40 CFR 60, Subpart Kb as this rule existed prior to October 2003 because these tanks have storage capacities less than 40 cubic meters (10,566 gallons).
- (c) All tanks not identified in paragraphs (a) and (b) above and not used to store benzene are not subject to 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12) because these tanks were constructed prior to July 23, 1984.
- (d) Although constructed after June 11, 1973 and before July 23, 1984, the storage tanks identified in the table below are not subject to 40 CFR Part 60 Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19,

1978) or 40 CFR Part 60 Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 19, 1978, and Prior to July 23, 1984) (326 IAC 12) because the storage capacity of each tank is less than 40,000 gallons and the tanks are not used to store petroleum liquids.

Plant Location	Tank ID
Plant 26	2645A
Plant 27	209, 210, 240, 241, 242, 243, 244, 250, 251, 252, 253, 270, 274, 411, 412, 413, 414, 415, 421, 422, 423, 424, 425, 431, 432, 433, 434, 435, 441, 442, 443, 444, 445, 451, 452, 453, 454, 455, 528, 529, 601, 602, 603, 604, 605, 606, 607, 608, 612, 621, 622, 630, 631, 632, 650, and 651.
Plant 38	521, 522, and 523.
Plant 40	321, 322, 323, 324, 331, 332, 333, 334, 341, 342, 343, 344, 350, 351, 352, 353, 354, 355, 356, 357, 358, 361, and 363.
Plant 41	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 31, 32, 34, 36, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 227, 228, 229, 230, and 232.
Plant 47	700, 701, 702, 716, 717, 718, 719, 720, 721, 722, 726, 727, 728, 774, 777, 778, 779, 791, 792, 793, 795, and 799.
Plant 48	536, 537, and 538.
Wastewater Treatment Plant	4919 and 4921.

- (e) Although constructed after June 11, 1973 and before July 23, 1984, the storage tanks identified in the table below are not subject to 40 CFR Part 60 Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978) or 40 CFR Part 60 Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 19, 1978, and Prior to July 23, 1984) (326 IAC 12) because the tanks are not used to store petroleum liquids.

Plant Location	Tank ID
Plant 27	60, 61, 62, 63, 67, 70, 71, 72, 73, 102, 103, 106, 107, 108, 109, 110, 112, 113, 116, 117, 200, 201, 202, 203, 204, 205, 206, 260, 261, 262, 263, 640, and 641.
Plant 29	2938, 2939, 2964, 2965, and 2966
Wastewater Treatment Plant	4915, 4916, 4917, and 4918.

Although the storage capacity of tank 2603 (located at Plant 26) was not provided by the Permittee, this tank was constructed after June 11, 1973 and before July 23, 1984 and is not used to store petroleum liquids. Therefore, storage tank 2603 is not subject to the requirements of 40 CFR Part 60, Subpart K or 40 CFR Part 60, Subpart Ka (326 IAC 12).

- (f) The storage tanks 101, 105, 207, 208, and 611 located at Plant 27 and storage tanks 530, 531, 532 and 535 located at Plant 48 are not subject to the requirements of the New Source Performance Standards 40 CFR 60, Subpart K, Ka, or Kb (326 IAC 12) because these storage tanks were constructed prior to June 11, 1973.

**Federal Rule Applicability – Soil Remediation System**

- (a) There are no New Source Performance Standards (NSPS) (40 CFR 60 and 326 IAC 12) applicable to the Soil Remediation System.
- (b) The soil remediation operations are subject to the National Emission Standards for Hazardous Air Pollutants for Site Remediation, 40 CFR 63, Subpart GGGGG, promulgated on October 8, 2003 because this rule applies to site remediation activities at

facilities that store, process, treat, or otherwise manage materials containing organic HAP.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the site remediation facilities except when otherwise specified in 40 CFR 63 Subpart GGGGG.

Since this rule has a future compliance date of October 8, 2006, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification no later than October 8, 2006 that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart GGGGG, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2).
- (2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) in accordance with 40 CFR 63.7950(e). The Notification of Compliance Status must be submitted:
  - (A) Before the close of business on the 30th calendar day following completion of the initial compliance demonstration for each initial compliance demonstration that does not include a performance test; and
  - (B) Before the close of business on the 60th calendar day following the completion of the performance test according to the requirement specified in 40 CFR 63.10(d)(2) for each initial compliance demonstration that includes a performance test or design evaluation. The Permittee shall submit the complete design evaluation and supporting documentation and the performance test results, as applicable.
- (3) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.7950(a) and (d).
- (4) If required to use a continuous monitoring system (CMS), notifications, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test, as required by 40 CFR 63.7950(a).

#### **Federal Rule Applicability – Insignificant Degreasing Operations**

- (a) There are no New Source Performance Standards (NSPS) (40 CFR 60 and 326 IAC 12) applicable to this facility.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 61, 40 CFR 63, 326 IAC 14, and 326 IAC 20) applicable to this facility.

The degreasing operation is not subject to 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvents) because they do not use halogenated solvents.

#### **Federal Rule Applicability – Recently Promulgated NESHAP Requirements**

- (a) The product loading operations are subject to 40 CFR 63, Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline) because they operate organic liquid distribution facilities and are a major source of hazardous air pollutants. Reilly must comply with the requirements of 40 CFR

63, Subpart EEEE prior to the February 3, 2007 compliance date and must submit an initial notification by June 2, 2004.

- (b) Since this chemical plant manufactures chemicals under the NAICS code 325 and uses organic HAPs listed in 112(b) of the Clean Air Act (e.g., acetaldehyde, propionaldehyde, benzene, and formaldehyde), it is subject to the requirements of 40 CFR 63, Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing. Reilly must comply with the requirements of 40 CFR 63, Subpart FFFF by the November 10, 2006 compliance date. copy of the signed version of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/oarpg/t3pfpr.html>.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected facilities except when otherwise specified in 40 CFR 63 Subpart FFFF. Since this rule has a future compliance date, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart FFFF, the Permittee shall submit:

- (1) The notifications in 40 CFR 63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:
  - (A) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than 120 days after the effective date of 40 CFR 63, Subpart FFFF; and
  - (B) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.2515(c). For any performance test required as part of the initial compliance procedures for batch process vents in Table 2 to 40 CFR 63, Subpart FFFF, the Permittee shall submit the test plan required by 40 CFR 63.7(c) and the emission profile with the notification of the performance test.
- (2) A precompliance report to request approval for any of the items in 40 CFR 63.2520(c)(1) through (7) at least six (6) months prior to the compliance date.
- (3) A notification of compliance status report according to the schedule in paragraph (A), and the notification of compliance status report must contain the information specified in paragraph (B).
  - (A) The Permittee shall submit the notification of compliance status report no later than 150 days after the compliance date specified in 40 CFR 63.2445(b).
  - (B) The notification of compliance status report shall include the information in 40 CFR 63.2520(d)(2)(i) through (ix).

## State Rule Applicability – Entire Source

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

As a chemical plant, this source belongs to one of the 28 listed categories listed in 326 IAC 2-2-1(y)(1). This source began construction prior to 1977 and was an existing major source under PSD.

In 1987, the source added a vent gas control system to Plant 2. The system included two (2) scrubbers and a vent gas incinerator burning natural gas or #5 fuel oil. The increase in potential emissions from this modification were less than the PSD thresholds. Therefore, this modification did not trigger PSD review.

In 1990, the source added a 25.1 MMBtu/hour, natural gas-fired boiler (identified as CB600-300). Since the potential to emit regulated pollutants from this boiler were less than the PSD thresholds, this boiler was not subject to the requirements of 326 IAC 2-2.

Also in 1990, the source added a molecular sieves regenerator (drying facility) equipped with a water scrubber. The potential to emit VOC after the control device is 0.28 tons per year. The construction permit issued for this modification limited the VOC emissions from the scrubber to 0.063 pounds per hour and 0.04 tons per year. The permit also limited the operation of this facility to 1,350 hours per year. The source must maintain records of the hours of operation once per shift. Therefore, this modification was not subject to PSD review. The following limit has been included in the draft permit:

The drying facility shall comply with the following limitations:

- (a) The emissions of VOC from the drying facility stack exhaust shall not exceed 0.063 pounds per hour and 0.04 tons per twelve month period.
- (b) The scrubber used to control emissions from the drying facility shall be in operation at all times the drying facility is in operation.
- (c) The number of hours of operation for the drying facility shall not exceed 1,350 hours per twelve consecutive month period. The source shall maintain records of the hours of operation once per shift.

Compliance with these limits make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 not applicable.

In 1995, the source added a 61.1 MMBtu/hour, natural gas-fired boiler (identified as CN5-300). Since the potential to emit regulated pollutants from this boiler is less than the PSD thresholds, this boiler is not subject to the requirements of 326 IAC 2-2.

In 1999, the source added a 91.1 MMBtu/hour boiler (identified as CB-70K (previously referred to as CB-RENT2)), which was fired on natural gas. Since the potential to emit regulated pollutants from this boiler were less than the PSD thresholds, the boiler was not subject to the requirements of 326 IAC 2-2. The source requested permission on July 15, 2003 to modify this boiler so that distillate fuel oil could also be burned in this boiler. This modification to the boiler would increase the potential emissions of sulfur dioxide and nitrogen oxides to greater than the PSD thresholds. However, the source accepted limitations on the amount of fuel burned in this boiler, such that the emissions would remain below the PSD thresholds. The following condition has been included in the permit:

The amount of distillate oil and distillate oil equivalents burned in boiler CB-70K shall not exceed 1,124 Kgallons per twelve (12) consecutive month period, with compliance determined at the end of each month. The sulfur content of the fuel oil shall not exceed 0.5% by weight. For the purposes of determining compliance, burning 1 million cubic feet of natural gas is equivalent to burning 1.41 kgallon of distillate fuel. Compliance with this condition ensures that both the SO<sub>2</sub> and NO<sub>x</sub> emissions from the boiler do not exceed

39.9 tons per year and makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

This fuel usage limit was calculated as follows:

Type of Fuel Combusted	SO <sub>2</sub>		NO <sub>x</sub>	
	PTE (tons/yr)	AP-42 Emission Factor*	PTE (tons/yr)	AP-42 Emission Factor*
Natural Gas Only	0.2	0.6 lbs/mmcf	39.9	100lbs/MMcf
Distillate Oil Only	202.4	71 lbs/kgal.	68.4	24.0lbs/kgal.

\*- Emissions factors for sulfur dioxide and nitrogen oxides are from AP-42, Chapter 1.3 (Supplement E, 9/98)]

$$\text{Distillate oil limit} = (39.9\text{tons/yr} * 2000\text{lbs/ton})/71\text{lbs/kgal.} = 1,124 \text{ kgallons/year}$$

Burning 1MMcf of natural gas is equivalent to (100lbs/MMcf of natural gas)/(71lbs/kgal of distillate), or burning 1.41 kgallons of distillate grade fuel oil.

326 IAC 2-4.1 (New Source Toxics Controls)

Plant 27 is not subject to the requirements of 326 IAC 2-4.1 because this plant was constructed prior to the July 27, 1997.

Plant 40 is not subject to the requirements of 326 IAC 2-4.1 because this plant was constructed prior to the July 27, 1997.

Plants 38 and 41 are not subject to the requirements of 326 IAC 2-4.1 because this plant was constructed prior to the July 27, 1997.

Plants 47 and 48 are not subject to the requirements of 326 IAC 2-4.1 because they were constructed prior to July 27, 1997.

Although constructed after July 27, 1999, the Soil Remediation System is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit hazardous air pollutants from this facility is less than 10 tons per year for a single HAP and less than 25 tons per year for combined HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it has the potential to emit more than ten (10) tons per year of VOC and NO<sub>x</sub> and is located in Marion County. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

326 IAC 5-1 (Opacity Limitations)

This source is located in Wayne Township in Marion County and is therefore subject to the following opacity limitations:

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-1 (Nonattainment Area Limitations)**

This source is subject to the requirements of 326 IAC 6-1 because the potential to emit PM from the entire source is greater than 100 tons per year and the actual emissions of PM from the entire source are greater than 10 tons per year.

**State Rule Applicability – Individual Facilities**

**State Rule Applicability – Boilers**

**326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)**

The boilers are not subject to the requirements of 326 IAC 6-2 because they are subject to the requirements of 326 IAC 6-1 (Nonattainment Area Limitations). Pursuant to 326 IAC 6-2-1(e), boilers subject to the requirements of 326 IAC 6-1 are not subject to the limitations in 326 IAC 6-2.

**326 IAC 6-1 (Nonattainment Area Limitations)**

The boilers are subject to the requirements of 326 IAC 6-1 because the potential to emit PM from the entire source is greater than 100 tons per year and the actual emissions of PM from the entire source are greater than 10 tons per year.

Boilers 11-112E, 28-186N, 30-2726S, and 70-2722W are subject to the requirements of 326 IAC 6-1-12 (Marion County) because they are included on the list of regulated emission units. The following emission limitations have been included in the draft permit:

Pursuant to 326 IAC 6-1-12 (Marion County), boilers 11-112E, 28-186N, 30-2726S, and 70-2722W are subject to the following limitations:

Boiler I.D.	PM Limitation	
	in Tons per year	in lbs per MMBtu
11-112E	0.5	0.15
30-2726S	7.8	0.15
70-2722W	3.5	0.15
28-186N	Shall burn only natural gas	

Since boilers CB600-300, CN5-400 and CB-70K are not specifically listed in 326 IAC 6-1-12 (Marion County), they are subject to the requirements of 326 IAC 6-1-2(b). The following emission limitations have been included in the draft permit:

Pursuant to 326 IAC 6-1-2(b)(5)(Nonattainment Area Limitations), the particulate matter content of natural gas burned in the boilers identified as CB600-300, CN5-400, and CB-70K shall be limited to 0.01 grains per dry standard cubic foot of natural gas.

Pursuant to 326 IAC 6-1-2(b)(4)(Nonattainment Area Limitations), the particulate matter emissions from boiler CB-70K shall be limited to 0.15 pounds per million Btu when burning fuel oil.

**326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)**

Since boilers 11-112E, 28-186N, 30-2726S, and 70-2722W are listed in 326 IAC 7-4-2, they are not subject to the requirements of 326 IAC 7-1.1-2.

Boilers CB600-300 and CN5-400 are not subject to the requirements of 326 IAC 7-1.1-2 because they each have a potential to emit sulfur dioxide that is less than 25 tons per year.

Boiler CB-70K is subject to the requirements of 326 IAC 7-1.1-2 because the potential to emit sulfur dioxide when burning fuel oil is greater than 25 tons per year. Since this boiler is also subject to 40 CFR 60, Subpart Dc, compliance with the 0.5% by weight sulfur content limit for fuel oils will ensure compliance with the 326 IAC 7-1.1-2.

**326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations)**

Boilers CB600-300, CN5-400 and CB-70K are not subject to the requirements of this rule because they are not listed in 326 IAC 7-4.

Since boilers 11-112E, 28-186N, 30-2726S, and 70-2722W are among the emission units listed in this rule, the following condition has been included in the draft permit:

Pursuant to 326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations), emissions of sulfur dioxide from boilers 11-112E, 28-186N, 30-2726S, and 70-2722W shall not exceed the emission rates provided in the following table:

Boiler I.D.	SO <sub>2</sub> Emission Limitations	
	lbs per MMBtu	lbs per hour
11-112E	Less than 0.05	Less than 0.05
28-186N	1.25	46.0
30-2726S	1.25	49.1
70-2722W	1.25	114.75

In order to demonstrate compliance with these limitations, the source is required by 326 IAC 7-2(e) to maintain records of the calendar month average sulfur emission rate in pounds per million British thermal units.

**326 IAC 11-8 (Commercial and Industrial Solid Waste Incineration Units)**

The boilers are not subject to the requirements of 326 IAC 11-8 because they do not meet the definition of a solid waste incinerator provided in 40 CFR 60.2875, which defines a solid waste incineration as “solid waste combustion in an enclosed device using controlled flame combustion without energy recovery...”

**326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)**

The boilers are not subject to the requirements of 326 IAC 10-4 because they are not used to generate electricity and do not meet the definition of large affected units as defined in 326 IAC 10-4-2(27).

**State Rule Applicability - Process heaters**

**326 IAC 6-1 (Nonattainment Area Limitations)**

The heaters are subject to the requirements of 326 IAC 6-1 because the potential to emit PM from the entire source is greater than 100 tons per year and the actual emissions of PM from the entire source are greater than 10 tons per year.

Process heaters 722804, BX2707V, BXS2706Q, BS2740Q, BT2728S, BM2724W, BD2714V, EP2729Q, 732714, FC2607T, and AL2713W are subject to the requirements of 326 IAC 6-1-12 (Marion County) because they are included on the list of regulated emission units. The following emission limitations have been included in the draft permit:

Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations), the particulate matter emissions from the heaters shall be limited as follows:

Heater	PM Limitation	
	in Tons per year	in lbs per MMBtu

722804	Shall burn only natural gas	
BX2707V	0.4	0.011
BXS2706Q	0.1	0.011
BS2740Q	2.0	0.15
BT2728S	2.2	0.15
BM2724W	Shall burn only natural gas	
BD2714V	3.1	0.15
EP2729Q	0.1	0.011
732714	7.5	0.15
FC2607T	Shall burn only natural gas	
AL2713W	Shall burn only natural gas	

Since heaters SB2710P and NB2720Q are not specifically listed in 326 IAC 6-1-12 (Marion County), they are subject to the requirements of 326 IAC 6-1-2(b). The following emission limitations have been included in the draft permit:

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from heaters SB2710P and NB2720Q shall be limited to 0.03 grains per dry standard cubic foot.

**326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)**

Since heaters 722804, BX2707V, BX2706Q, BS2740Q, BT2728S, BM2724W, BD2714V, SB2710P, EP2729Q, 732714, FC2607T, and AL2713W are listed in 326 IAC 7-4-2, they are not subject to the requirements of 326 IAC 7-1.1-2.

Heater NB2720Q, which is not listed in 326 IAC 7-4-2, is not subject to the requirements of 326 IAC 7-1.1-2 because it is a very small process heater and has a potential to emit sulfur dioxide that is less than 25 tons per year.

**326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations)**

Heater NB2720Q is not subject to the requirements of this rule because it is not listed in 326 IAC 7-4.

Since all the other process heaters are among the emission units listed in this rule, the following condition has been included in the draft permit:

Pursuant to 326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations), emissions of sulfur dioxide from the heaters shall not exceed the emission rates provided in the following table:

Heaters	SO <sub>2</sub> Emission Limitations	
	lbs per MMBtu	lbs per hour
722804	Less than 0.05	Less than 0.05
BX2707V	1.25	20.0
BXS2706Q	Less than 0.05	Less than 0.05
BS2740Q	1.25	7.5
BT2728S	1.25	7.5
BM2724W	1.25	26.3
BD2714V	1.25	18.8
SB2710P	Less than 0.05	Less than 0.05
EP2729Q	1.25	3.8

732714	1.25	45.0
FC2607T	Less than 0.05	Less than 0.05
AL2713W	Less than 0.05	Less than 0.05

Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

**326 IAC 11-8 (Commercial and Industrial Solid Waste Incineration Units)**

The process heaters 722804, BX2707V, BX2706Q, BS2740Q, BT2728S, BM2724W, BD2714V, SB2710P, NB2720Q, EP2729Q, and 732714 are not subject to the requirements of 326 IAC 11-8 because they do not meet the definition of a solid waste incinerator provided in 40 CFR 60.2875, which defines a solid waste incineration as “solid waste combustion in an enclosed device using controlled flame combustion without energy recovery...”

**326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)**

The process heaters are not subject to the requirements of 326 IAC 10-4 because they are not used to generate electricity and do not meet the definition of large affected units as defined in 326 IAC 10-4-2(27).

**State Rule Applicability – Plant 27**

**326 IAC 6-1 (Nonattainment Area Limitations)**

The catalyst regenerator is subject to the requirements of 326 IAC 6-1 because the potential to emit PM from the entire source is greater than 100 tons per year and the actual emissions of PM from the entire source are greater than 10 tons per year. The following limit has been included in the draft permit:

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the Catalyst Regenerator shall be limited to 0.03 grains per dry standard cubic foot.

**326 IAC 6-1-12 (Marion County)**

The Catalyst Regenerator is not subject to the requirements of 326 IAC 6-1-12 (Marion County) because this is not included on the list of regulated emission units.

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

Plant 27 is not subject to the requirements of 326 IAC 8-1-6 because it was constructed prior to the January 1, 1980 applicability date.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

Although constructed prior to January 1, 1980, Plant 27 is not subject to the requirements of 326 IAC 8-6 because the potential emissions are less than 100 tons per year.

**State Rule Applicability – Plant 40**

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

Plant 40 is not subject to the requirements of 326 IAC 8-1-6 because it was constructed prior to the January 1, 1980 applicability date.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

326 IAC 8-6 (Organic Solvent Emission Limitations)  
Although constructed prior to January 1, 1980, Plant 40 is not subject to the requirements of 326 IAC 8-6 because the potential emissions are less than 100 tons per year.

**326 IAC 6-1-2 (Particulate Emission Limitations) and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**

Plant 40 is not subject to the provisions of 326 IAC 6-1-2 or 326 IAC 6-3 because this facility does not emit particulates.

326 IAC 6-1-12 (Marion County)

Plant 40 is not subject to 326 IAC 6-1-12 because none of the emission units located at this plant is specifically listed in this rule.

**State Rule Applicability – Plant 41, Plant 38, and the Niacinamide Packaging Unit**

326 IAC 4-2-2 (Incinerators)

The Plant 41 incinerator must comply with the following requirements:

Pursuant to 326 IAC 4-2, the incinerator shall:

- (1) Consist of primary and secondary chambers or the equivalent;
- (2) Be equipped with a primary burner unless burning wood products;
- (3) Comply with 326 IAC 5-1 and 326 IAC 2;
- (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-26; and
- (5) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air.
- (6) If any of the requirements of (1) through (5) above are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

The Permittee must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

326 IAC 6-1 (Nonattainment Area Limitations)

The Niacinamide Packaging Unit is subject to the requirements of 326 IAC 6-1 because the actual emissions of PM from the entire source are greater than 10 tons per year. The following limit has been included in the draft permit:

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the packaging facilities shall be limited to 0.03 grains per dry standard cubic foot.

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

Plants 38 and 41 are not subject to the requirements of 326 IAC 8-1-6 because these facilities were constructed prior to the January 1, 1980 applicability date.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Plants 38 and 41 are not subject to the requirements of 326 IAC 8-6 because these facilities are subject to the requirements of 326 IAC 8-5-3. Facilities subject to the requirements of another Article 8 rule are exempt from the requirements of 326 IAC 8-6.

326 IAC 8-5-3 (Synthesized pharmaceutical manufacturing operations)

The Niacinamide Packaging facility is not subject to the requirements of 326 IAC 8-5-3 because no VOCs are used at this facility. Plants 38 and 41 are subject to the requirements of 326 IAC 8-5-3 because they are located in Marion County and were existing sources as of November 1, 1980. The following requirements have been included in the draft permit:

All reactors, distillation units, dryers, storage of volatile organic compounds, transfer of volatile organic compounds, extraction equipment, filters, crystallizers, and centrifuges that have the potential to emit equal to or greater than fifteen (15) pounds per day shall comply with the following requirements:

- (a) Volatile organic compound emissions from all reactors, distillation operations, crystallizers, centrifuges, and vacuum dryers shall be controlled by surface condensers or equivalent controls.
  - (1) The outlet gas temperature for surface condensers must not exceed:
    - (A) minus twenty-five degrees Celsius (-25°C) when condensing VOC of vapor pressure greater than forty (40) kilo Pascals (five and eight-tenths (5.8) pounds per square inch);
    - (B) minus fifteen degrees Celsius (-15 °C) when condensing VOC of vapor pressure greater than twenty (20) kilo Pascals (two and nine-tenths (2.9) pounds per square inch);
    - (C) zero degrees Celsius (0 °C) when condensing VOC of vapor pressure greater than ten (10) kiloPascals (one and five-tenths (1.5) pounds per square inch);
    - (D) ten degrees Celsius (10 °C) when condensing VOC of vapor pressure greater than seven (7) kiloPascals (one (1) pound per square inch); or
    - (E) twenty-five degrees Celsius (25 °C) when condensing VOC of vapor pressure greater than three and five-tenths (3.5) kilo Pascals (five-tenths (0.5) pound per square inch).
  - (2) The vapor pressures listed above shall be measured at twenty degrees Celsius (20 °C).
  - (3) Where equivalent controls are used, the VOC emissions must be reduced by at least as much as they would be by using a surface condenser which meets the requirements of paragraph (a)(A) of this condition.
- (b) VOC emissions from all air dryers and production equipment exhaust systems shall be limited to thirty-three (33) pounds per day.
- (c) The Permittee shall:
  - (1) provide a vapor balance system or equivalent control that is at least ninety percent (90%) effective in reducing emissions from truck or railcar deliveries to storage tanks with capacities greater than two thousand (2,000) gallons that store VOC with vapor pressures greater than twenty-eight (28) kiloPascals (four and one-tenth (4.1) pounds per square inch) at twenty degrees Celsius (20 °C); and
  - (2) install pressure/vacuum conservation vents set at plus or minus two-tenths ( $\pm$  0.2) kilo Pascals on all storage tanks that store VOC with vapor pressures greater than ten (10) kilo Pascals (one and five-tenths (1.5) pounds per square inch at twenty degrees Celsius (20 °C)), unless a more effective control system is used.
- (d) All centrifuges, rotary vacuum filters, and other filters having an exposed liquid surface, where the liquid contains VOC and exerts a total VOC vapor pressure of three and five-tenths (3.5) kiloPascals (five-tenths (0.5) pounds per square inch) or more at twenty degrees Celsius (20 °C ) shall be enclosed.
- (e) All inprocess tanks containing a volatile organic compound at any time shall be equipped with covers. These covers must remain closed, unless production, sampling, maintenance, or inspection procedures require operator access.

- (f) The Permittee shall repair all leaks from which a liquid, containing VOC, can be observed running or dripping. The repair shall be completed the first time the equipment is off line for a period of time long enough to complete the repair.

### **State Rule Applicability – Plants 47 and 48**

#### **326 IAC 4-2-2 (Incinerators)**

The waste gas incinerator must comply with the following requirements:

Pursuant to 326 IAC 4-2, the incinerator shall:

- (1) Consist of primary and secondary chambers or the equivalent;
- (2) Be equipped with a primary burner unless burning wood products;
- (3) Comply with 326 IAC 5-1 and 326 IAC 2;
- (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-26; and
- (5) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air.
- (6) If any of the requirements of (1) through (5) above are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

The Permittee must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

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

The drying facility located at Plants 47 as constructed in 1990 and has potential VOC emissions before controls greater than 25 tons per year. Although a BACT review was not performed before construction, the source installed a wet scrubber and accepted limits on the VOC emissions and the number of operating hours per year. IDEM and OES believe that the installation of the scrubber and the limitations on emissions and operating hours accepted prior to construction, satisfy the requirements of 326 IAC 8-1-6. The following condition has been added to the draft permit:

The drying facility shall comply with the following BACT requirements:

- (a) The emissions of VOC from the drying facility stack exhaust shall not exceed 0.063 pounds per hour and 0.04 tons per twelve month period.
- (b) The scrubber used to control emissions from the drying facility shall be in operation at all times the drying facility is in operation.
- (c) The number of hours of operation for the drying facility shall not exceed 1,350 hours per twelve consecutive month period.

Compliance with these limits make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 not applicable.

Plant 48 and the remainder of Plant 47 are not subject to the requirements of 326 IAC 8-1-6 because they were constructed prior to January 1, 1980.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

Although constructed prior to January 1, 1980, Plants 47 and 48 are not subject to the requirements of 326 IAC 8-1-6 because the potential VOC emissions from these facilities are less than 100 tons per year.

**326 IAC 6-1-2 (Particulate Emission Limitations) and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**

Plant 47 and Plant 48 are not subject to the requirements of this rule because they do not emit particulate matter.

**326 IAC 6-1-12 (Marion County)**

Plants 47 and 48 are not subject to 326 IAC 6-1-12 because none of the emission units located at these plants are specifically listed in this rule.

**State Rule Applicability - Wastewater Treatment Plant**

**326 IAC 6-1 (Nonattainment Area Limitations)**

The sludge dryer is subject to the requirements of 326 IAC 6-1 because the potential to emit PM from the entire source is greater than 100 tons per year and the actual emissions of PM from the entire source are greater than 10 tons per year. The following emission limitation has been included in the draft permit:

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the sludge dryer shall be limited to 0.03 grains per dry standard cubic foot.

**326 IAC 6-1-12 (Marion County)**

The sludge dryer is not subject to the requirements of 326 IAC 6-1-12 (Marion County) because this is not included on the list of regulated emission units.

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

The sludge dryer is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because this emission unit is subject to the more stringent emission limits in 326 IAC 6-1.

**326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)**

The sludge dryer is not subject to the requirements of 326 IAC 7-1.1-2 because it has a potential to emit sulfur dioxide that is less than 25 tons per year.

**326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations)**

The sludge dryer is not subject to the requirements of this rule because it is not one of the emission units listed in 326 IAC 7-4.

**State Rule Applicability - Benzene Storage Tanks**

**326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)**

The benzene storage tanks are not subject to the requirements of 326 IAC 8-9 because this rule applies only to storage tanks located in Lake, Floyd, Porter or Clark counties.

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

Although some of the benzene storage tanks were constructed after January 1, 1980, the tanks are not subject to the requirements of 326 IAC 8-1-6 because the potential to emit VOC for each tank is less than the applicability threshold of 25 tons per year.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

Although some of the benzene storage tanks were constructed prior to January 1, 1980, the tanks are not subject to the requirements of 326 IAC 8-6 because the potential to emit VOC was less than 100 tons per year.

## State Rule Applicability - Storage Tanks not used for Benzene Storage

### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The storage tanks are not subject to the requirements of 326 IAC 8-9 because this rule applies only to storage tanks located in Lake, Floyd, Porter or Clark counties.

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

Although some of the storage tanks were constructed after January 1, 1980, the tanks are not subject to the requirements of 326 IAC 8-1-6 because the potential to emit VOC for each tank is less than the applicability threshold of 25 tons per year.

### 326 IAC 8-6 (Organic Solvent Emission Limitations)

Although some of the storage tanks were constructed prior to January 1, 1980, they are not subject to the requirements of 326 IAC 8-6 because these sources have potential VOC emissions less than 100 tons per year.

### 326 IAC 12 (New Source Performance Standards)

The tanks identified as 11, 30, 33, 35, 2969, 2647, 2650, 2651, 305, 366, 367, 37, 536, 537, 538, 4927, 107, 110, T-101, 118, 359, 360, 372, 373, 225, 235, 797, and CL-101 are subject to 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) as the rule existed prior to October 2003 because these tanks have storage capacities greater than 40 cubic meters (10,566 gallons).

- (a) Storage tank 2969 must comply with the requirements of 40 CFR 60.112b, 60.113b, 60.115b, and 60.116b.
- (b) Storage tanks 11, 30, 33, 35, 2647, 2650, 2651, 305, 366, 367, 37, 536, 537, 538, 4927, 107, 110, and T-101, which have capacities greater than 40 cubic meters (10,566 gallons) and less than 75 cubic meters (19,813 gallons), are subject only to the record keeping requirements in 40 CFR 60.116b(b). Storage tanks 118, 359, 360, 372, 373, 225, 235, 797, and CL-101 are subject only to the recordkeeping requirements in 40 CFR 60.116b(b) and the reporting requirements in 40 CFR 60.116b(d).
- (c) Although EPA revised the applicability criteria for 40 CFR 60, Subpart Kb in October 2003, the previous version of 40 CFR 60, Subpart Kb is still applicable to sources in Indiana pursuant to 326 IAC 12 and 326 IAC 1-1-3. Once the revised version of 40 CFR 60, Subpart Kb is incorporated into the Indiana Administrative Code, the storage tanks listed below will no longer be subject to the record keeping requirements in 40 CFR 60.116b(a) and (b).
  - (1) Tanks 11, 30, 33, 35, 2647, 2650, 2651, 305, 366, 367, 37, 536, 537, 538, 4927, 107, 110, and T-101 because they have storage capacities less than 75 cubic meters (19,813 gallons);
  - (2) Tanks 118, 359, 360, 372, 373, 225, 235, and 797 because these storage tanks have capacities greater than 75 cubic meters (19,813 gallons) but less than 151 cubic meters (39,890 gallons) and are used to store liquids with a maximum vapor pressure of 2.2 psia; and
  - (3) Tank CL-101 because this storage tank has a capacity greater than 151 cubic meters (39,890 gallons) and is used to store liquids with maximum vapor pressures less than 0.5 psia.

### **State Rule Applicability – Soil Remediation System**

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

Although constructed after January 1, 1980, the Soil Remediation System is not subject to the requirements of 326 IAC 8-1-6 because the potential VOC emissions are less than 25 tons per year.

#### 326 IAC 6-1-2 (Particulate Emission Limitations)

The Soil Remediation System is not subject to 326 IAC 6-1-2 because there are no particulate emissions from this facility.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 does not apply to the Soil Remediation System because it was constructed after January 1, 1980.

### **State Rule Applicability – Insignificant Degreasing Operations**

#### 326 IAC 8-3 (Degreasing Operations)

The degreasing operation is not subject to the requirements of 326 IAC 8-3 because it was constructed prior to 1980 and has potential VOC emissions less than 100 tons per year.

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

The degreasing operations were constructed prior January 1, 1980 and are therefore not subject to the requirements of 326 IAC 8-1-6.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

Although constructed prior to January 1, 1980, this facility is not subject to the requirements of 326 IAC 8-6 because it has potential VOC emissions less than 100 tons per year.

### **Testing Requirements**

If the sludge dryer located at the Wastewater Treatment Plant is returned to operation, Reilly will be required to comply with either the emission testing or sludge testing requirements of 40 CFR 61, Subpart E. The testing requirements for this NESHAP have been included in the Compliance Determination section of Section D.6.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 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, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit 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 Section D of the permit. 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. The compliance monitoring requirements applicable to this source are as follows:

1. The boilers 11-112E, 30-2726S, 70-2722W, CB600-300, and CB-70K have applicable compliance monitoring conditions as specified below:

Visible emission notations of boilers 11-112E, 30-2726S, 70-2722W, CB600-300, and CB-70K stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and burning oil. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with the Compliance Response Plan, shall be considered a deviation from the permit.

This monitoring requirement is necessary because the boilers must operate properly to ensure compliance with 326 IAC 6-1-12 (Nonattainment Area Particulate Limitation for Marion County), 7-1.1-2 (Sulfur Dioxide Emission Limitations) and 326 IAC 7-4 (Sulfur Dioxide Emission Limitation).

2. The Process Heaters have applicable compliance monitoring conditions as specified below:

Visible emission notations of heaters 722804, BX2707V, BX2706Q, BS2740Q, BT2728S, BM2724W, BD2714V, SB2710P, NB2720Q, EP2729Q, and 732714 stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and burning process gas. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with the Compliance Response Plan shall be considered a deviation from the permit.

This monitoring requirement is necessary because the process heaters must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment Area Particulate Limitations) and 326 IAC 7-4 (Sulfur Dioxide Emission Limitation).

3. The packaging facilities have applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the packaging facility stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance

with the Compliance Response Plan shall be considered a deviation from this permit.

- (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the packaging facilities, at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with the Compliance Response Plan shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Pressure Gauge and Other Instrument Specifications included in Section C of the draft permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of all bags controlling the process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (d) In the event that bag failure has been observed: For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with the Compliance Response Plan shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of the permit (Section B - Emergency Provisions).

This monitoring requirement is necessary because the baghouses must operate properly to ensure compliance with 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitation).

- 4. The incinerator located at Plant 47 shall have applicable compliance monitoring conditions as specified below:

Visible emission notations of the incinerator stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained

employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions from that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with the Compliance Response Plan shall be considered a deviation from the permit.

This monitoring requirement is necessary to ensure compliance with 326 IAC 4-2 (Incinerator Requirements).

5. The drying facilities located at Plant 47 shall have applicable compliance monitoring conditions as specified below:
  - (a) A pH meter shall be calibrated, maintained, and operated for the drying facility scrubbers. The pH shall be recorded once per shift. When for any one reading, the pH is outside the normal range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.
  - (b) The Permittee shall monitor the scrubber recirculation rate at least once per shift for the scrubber controlling the emissions from the drying facility. When for any one reading the flow rate is outside the normal range, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. The Compliance Response Plan for the scrubbers shall contain troubleshooting contingency and corrective actions for when the flow rate reading is outside of the normal range for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with the Compliance Response Plan shall be considered a deviation from the permit. The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.
  - (c) An inspection shall be performed each calendar quarter of the scrubber controlling the drying facilities.
  - (d) In the event that a scrubber malfunction has been observed, the failed scrubber and the associated processes shall be shut down immediately until the scrubber has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

The VOC monitoring requirement is necessary because the scrubbers must operate properly to avoid applicability of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 not applicable.

## Conclusion

The operation of this chemical plant shall be subject to the conditions of this Part 70 permit 097-7552-00315.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Indianapolis Office of Environmental Services**

Addendum to the  
Technical Support Document for a Part 70 Operating Permit

Source Name: Reilly Industries, Inc.  
Source Location: 1500 South Tibbs Avenue, Indianapolis, Indiana 46242  
County: Marion  
SIC Code: 2899 and 2869  
Operation Permit No.: T097-7552-00315  
Permit Reviewer: Angelique Olinger

On April 28, 2004, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Reilly Industries, Inc. had applied for a Part 70 Operating Permit for the operation of a chemical plant used to manufacture pyridine, pyridine derivatives, organic acid esters, niacinamide (B-3) and other organic chemicals. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of sixty (60) days to provide comments on whether or not this permit should be issued as proposed.

Written comments, both general and specific, were received from Reilly Industries, Inc. on June 28, 2004. General comments are those in regards to general concepts affecting numerous permit conditions. Specific comments are those in regards to specific permit conditions. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added, and the language with a line through it has been deleted. The Table Of Contents has been modified to reflect these changes.

**General Comment 1:**

As a general comment on the overall incorporation of NESHAP requirements in the permit Reilly Industries, Inc. would like to request a rewrite of the NESHAP language as it is incorporated in the permit. Reilly Industries, Inc. has extensive NESHAP requirements and has been in compliance with each of these NESHAPs since the effective date of each. Sections D.6, D.9, and D.10 have either numerous errors or pages of paraphrased requirements. Paraphrasing or modifying the NESHAP language can lead to requirements which are not consistent with the original rule, which is certainly not an intended outcome of the Title V air permit process. Reilly Industries, Inc. has identified a number of incorrect, incomplete, or potentially confusing references that have been established in the permit. The following identifies a number of requested changes by identifying the proposed condition, the proposed reference and what Reilly Industries, Inc. believes the correct reference should be. Reilly Industries, Inc. would like to make an overall request to pare down the NESHAP incorporation by reference to sections of the NESHAPs not to permit conditions and not to paraphrase NESHAP language in the permit. Reilly Industries, Inc. requests the following changes:

D.6.1 General Provisions Relating to NESHAPs [326 IAC 20-1] [40 CFR 63, Subpart A] [326 IAC 14] [40 CFR 61, Subpart A]

- 
- (a) The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the Wastewater Treatment Plant except when otherwise specified in 40 CFR 63, Subpart DD.

- (b) The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14, apply to the sludge dryer except when otherwise specified in 40 CFR 61, Subpart E.
- (c) The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14, apply to the waste collection and treatment system except when otherwise specified in 40 CFR ~~63 61~~, Subpart FF.

...

**D.6.3 General Standards for 40 CFR 63, Subpart DD [40 CFR 63.683][326 IAC 20-23]**

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- (a) ...
- (b) ...
- (c) The average VOHAP concentration of the off-site material shall be determined using:
  - (1) The direct measurement approach described in Condition ~~D.6.9(a)~~ **D.6.10(a)**; or
  - (2) Knowledge of the off-site material as described in Condition ~~D.6.9(b)~~ **D.6.10(b)**.

...

**D.6.6 Standards Required by 40 CFR 61, Subpart FF [326 IAC 14] [40 CFR 61.342]**

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- (a) ...
- (b) Pursuant to 40 CFR 61.342(g), compliance with this subpart will be determined by review of the Permittee's records and results from tests and inspections using methods and procedures specified in ~~D.6.8~~ **D.6.9**.

...

**D.6.9 Test Methods, Procedures and Compliance Provisions for 40 CFR 61, Subpart FF [326 IAC 14] [40 CFR 61.355]**

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- (a) Pursuant to 40 CFR 61.355(a), the Permittee shall determine the total annual benzene quantity from facility waste by the following procedure:
  - (1) For each waste stream subject to 40 CFR Part 61, Subpart FF having a flow-weighted annual average water content greater than 10 percent water, on a volume basis as total water, or is mixed with water or other wastes at any time and the resulting mixture has an annual average water content greater than 10 percent as specified in Condition ~~D.6.5(a)~~ **D.6.6(a)**, the Permittee shall:
    - (A) Determine the annual waste quantity for each waste stream using the procedures specified in Condition ~~D.6.5(b)~~ **D.6.6(a)**.
    - (B) Determine the flow-weighted annual average benzene concentration for each waste stream using the procedures specified in Condition ~~D.6.5(c)~~ **D.6.6(a)**.
    - (C) Calculate the annual benzene quantity for each waste stream by multiplying the annual waste quantity of the waste stream times the flow-weighted annual average benzene concentration.

Total annual benzene quantity from facility waste is calculated by adding together the annual benzene quantity for each waste stream generated during the year and the annual benzene quantity for each process unit turnaround waste annualized according to Condition ~~D.6.5(b)(4)~~ **D.6.6(a)**.

- (2) If the total annual benzene quantity from facility waste is equal to or greater than 11 ton/yr, then the Permittee shall comply with the requirements of §61.342 (c), (d), or (e).
  - (3) If the total annual benzene quantity from facility waste is less than 11 ton/yr but is equal to or greater than 1.1 ton/yr, then the Permittee shall:
    - (A) Comply with the recordkeeping requirements in Condition ~~D.6.14~~ **D.6.13** and reporting requirements in Condition ~~D.6.12~~ **D.6.14**; and
    - (B) Repeat the determination of total annual benzene quantity from facility waste at least once per year and whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 11 ton/yr or more.
  - (4) If the total annual benzene quantity from facility waste is less than 1.1 ton/yr, then the Permittee shall:
    - (A) Comply with the recordkeeping requirements in Condition ~~D.6.14~~ **D.6.13** and reporting requirements in Condition ~~D.6.12~~ **D.6.14**.
    - (B) Repeat the determination of total annual benzene quantity from facility waste whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 1.1 ton/yr or more.
  - (5) The benzene quantity in a waste stream that is generated less than one time per year, except as provided for process unit turnaround waste in Condition ~~D.6.5(b)(4)~~ **D.6.6(a)**, shall be included in the determination of total annual benzene quantity from facility waste for the year in which the waste is generated unless the waste stream is otherwise excluded from the determination of total annual benzene quantity from facility waste in accordance with Conditions ~~D.6.5(a) through D.6.5(c)~~ **D.6.6(a)**. The benzene quantity in this waste stream shall not be annualized or averaged over the time interval between the activities that resulted in generation of the waste, for purposes of determining the total annual benzene quantity from facility waste.
- (b) Pursuant to 40 CFR 61.355(b) and for purposes of the calculation required by Condition ~~D.6.5(a)~~ **D.6.6(a)**, the Permittee shall determine the annual waste quantity at the point of waste generation, by one of the following methods:
- (1) Select the highest annual quantity of waste managed from historical records representing the most recent 5 years of operation;
  - (2) Use the maximum design capacity of the waste management unit; or
  - (3) Use measurements that are representative of maximum waste generation rates;
  - (4) The determination of annual waste quantity for each process unit turnaround waste generated only at 2 year or greater intervals, may be made by dividing the total quantity of waste generated during the most recent process unit turnaround by the time period (in the nearest tenth of a year) between the turnaround resulting in generation of the waste and the most recent preceding process turnaround for the unit. The resulting annual waste quantity shall be included in the calculation of the annual benzene quantity as provided in Condition ~~D.6.5(a)(1)(C)~~ **D.6.6(a)** of this section for the year in which the turnaround occurs and for each subsequent year until the unit undergoes the next process turnaround. For estimates of total annual benzene quantity as specified in the 90-

day report, required under §61.357(a)(1), the Permittee shall estimate the waste quantity generated during the most recent turnaround, and the time period between turnarounds in accordance with good engineering practices. If the Permittee chooses not to annualize process unit turnaround waste, as specified in this paragraph, then the process unit turnaround waste quantity shall be included in the calculation of the annual benzene quantity for the year in which the turnaround occurs.

- (c) Pursuant to 40 CFR 61.355(c) and for the purposes of the calculation required by Condition ~~D.6.5(a)~~ **D.6.6(a)**, the Permittee shall determine the flow-weighted annual average benzene concentration in a manner that meets the requirements given in Condition ~~D.6.5(c)(1)~~ **D.6.6(a)** using either of the methods given in Conditions ~~D.6.5(c)(2)~~ and ~~(c)(3)~~ **D.6.6(a)**:
- (1) The determination of flow-weighted annual average benzene concentration shall meet all of the following criteria:
- (A) The determination shall be made at the point of waste generation except for the process unit turnaround waste. The determination of flow-weighted annual average benzene concentration for process unit turnaround waste shall be made using either of the methods given in Condition ~~D.6.5(c)(2) or (c)(3)~~ **D.6.6**. The resulting flow-weighted annual average benzene concentration shall be included in the calculation of annual benzene quantity as provided in Condition ~~D.6.5(a)(1)(C)~~ **D.6.6** for the year in which the turnaround occurs and for each subsequent year until the unit undergoes the next process unit turnaround.
  - (B) Volatilization of the benzene by exposure to air shall not be used in the determination to reduce the benzene concentration.
  - (C) Mixing or diluting the waste stream with other wastes or other materials shall not be used in the determination -- to reduce the benzene concentration.
  - (D) The determination shall be made prior to any treatment of the waste that removes benzene, except as specified for process unit turnaround waste in Condition ~~D.6.5(c)(1)(A)~~ **D.6.6(a)**.
  - (E) For wastes with multiple phases, the determination shall provide the weighted-average benzene concentration based on the benzene concentration in each phase of the waste and the relative proportion of the phases.
- (2) Knowledge of the waste. The Permittee shall provide sufficient information to document the flow-weighted annual average benzene concentration of each waste stream. Examples of information that could constitute knowledge include material balances, records of chemicals purchases, or previous test results provided the results are still relevant to the current waste stream conditions. If test data are used, then the Permittee shall provide documentation describing the testing protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the flow-weighted annual average benzene concentration for the waste stream. When the Permittee and IDEM, OAQ do not agree on determinations of the flow-weighted annual average benzene concentration based on knowledge of the waste, the procedures under Condition ~~D.6.5(c)(3)~~ **D.6.6(a)** of this section shall be used to resolve the disagreement.

...

Pursuant to 40 CFR 63.694, the average VOHAP concentration of an off-site material at the point-of-delivery shall be determined using either direct measurement as specified in ~~paragraph (a) of this Condition D.6.10(a)~~ or by knowledge as specified in ~~paragraph (b) of this Condition D.6.10(b)~~.

(a) Direct measurement to determine VOHAP concentration:

(1) . . .

(2) . . .

(3) Calculations. The average VOHAP concentration (C) on a mass-weighted basis shall be calculated by using the results for all samples analyzed in accordance with ~~paragraph (b)(2)(ii) Condition D.6.10(b)(2) of this condition~~ and the equation in 40 CFR 63.694(b)(iii). If the Permittee uses a test method that provides species-specific chemical concentrations, then the Permittee may adjust the measured concentrations to the corresponding concentration values which would be obtained had the off-site material samples been analyzed using Method 305. To adjust these data, the measured concentration for each individual HAP chemical species contained in the off-site material is multiplied by the appropriate species-specific adjustment factor listed in Table 1 of 40 CFR 63.694.

(b) Knowledge of the off-site material to determine VOHAP concentration:

(1) . . .

(2) . . .

(3) . . .

(4) In the event that IDEM, OAQ and the Permittee disagree on a determination of the average VOHAP concentration for an off-site material stream using knowledge, then the results from a determination of VOHAP concentration using direct measurement as specified in ~~paragraph (a) of this Condition D.6.10(a)~~ shall be used to establish compliance with the applicable requirements. The IDEM, OAQ may perform or request that the Permittee perform this determination using direct measurement.

...

D.6.12 Recordkeeping and Reporting Requirements [40 CFR 61, Subpart E][326 IAC 14]

(a) To demonstrate compliance with Condition D.6.4, the Permittee shall report the results of each determination to IDEM, OAQ by a registered letter within 15 calendar days following the date the determination was completed [40 CFR 61.53(d)(5) and 61.54(f)].

(b) Pursuant to 40 CFR 61.53(d)(6) and 61.54(g), the Permittee shall maintain records of emission test results, sludge sampling, sludge charging rate determination, and other data needed to determine compliance with the mercury emission standard in Condition ~~D.6.3(a)~~ **D.6.4**.

(c) To demonstrate compliance with Condition ~~D.6.3(b)~~ **D.6.4**, the Permittee shall report the results of monitoring required by 40 CFR 61.55(a) to IDEM, OAQ by registered letter within 15 calendar days following the date the determination is complete. The Permittee shall maintain all monitoring records.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.13 Recordkeeping Requirements for 40 CFR 61, Subpart FF [325 IAC 14] [40 CFR 61.356]

Pursuant to 40 CFR 61.356(b), the Permittee shall maintain the following records:

- (a) . . .
- (b) . . .
- (c) For each facility where the annual waste quantity for process unit turnaround waste is determined in accordance with Condition ~~D.6.5(b)(1)~~ **D.6.6(a)**, the records shall include all test results, measurements, calculations, and other documentation used to determine the following information: identification of each process unit at the facility that undergoes turnarounds, the date of the most recent turnaround for each process unit, identification of each process unit turnaround waste, the water content of each process unit turnaround waste, the annual waste quantity determined in accordance with Condition ~~D.6.5(b)(1)~~ **D.6.6(a)**, the range of benzene concentrations in the waste, the annual average flow-weighted benzene concentration of the waste, and the annual benzene quantity calculated in accordance with Condition ~~D.6.5(a)(1)(C)~~ **D.6.6(a)**.

D.8.3 Compliance Provisions for 40 CFR 61, Subpart Y [326 IAC 14][40 CFR 63, Subpart G] [326 IAC 20-12]

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Pursuant to 40 CFR 61.272, the Permittee shall comply with the following requirements for storage vessel 254:

- (a) . . .
- (b) Visually inspect the internal floating roof and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months, except as provided in ~~paragraph (d)(1) of this Condition~~ **D.8.3(d)(1)**. If the internal floating roof is not resting on the surface of the benzene liquid inside the storage vessel, or there is liquid on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, an extension of up to 30 additional days may be requested from the IDEM, OAQ in the inspection report required in Condition D.8.6(a). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will ensure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (c) Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspections as specified in ~~paragraph (b) of this Condition~~ **D.8.3(b)** and at intervals greater than 5 years in the case of vessels specified in ~~paragraph (d)(1) of this Condition~~ **D.8.3(d)(1)**.
  - (1) For all the inspections required by ~~paragraphs (a) and (c) of this Conditions~~ **D.8.3(a) and D.8.3(c)**, the Permittee shall notify the IDEM, OAQ in writing at least 30 days prior to the refilling of each storage vessel to afford IDEM, OAQ the opportunity to have an observer present. If the inspection required by ~~paragraph (c) of this Condition~~ **D.8.3(c)** is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the vessel, the Permittee shall notify the IDEM, OAQ at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, the notification including the written documentation may be made in writing and sent by express mail so that it is received by the IDEM, OAQ at least 7 days prior to refilling.

(2) . . .

(d) For vessels equipped with a double-seal system as specified in Condition D.8.2(b):

(1) Visually inspect the vessel as specified in ~~paragraph (c) of this~~ Condition **D.8.3(c)** at least every 5 years; or

(2) Visually inspect the vessel annually as specified in ~~paragraph (b) of this~~ Condition **D.8.3(b)**, and at least every 10 years as specified in ~~paragraph (c) of this~~ Condition **D.8.3(c)**.

. . .

**D.8.6 Reporting Requirements [40 CFR 61, Subpart Y] [326 IAC 14][40 CFR 63, Subpart G][326 IAC 20-12]**

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Pursuant to 40 CFR 61.275(a), the Permittee shall comply with the following reporting requirements for storage tanks 254:

(a) . . .

(1) . . .

(2) Where an annual report identifies any condition in ~~paragraph (a)(1) of this~~ Condition **D.8.6(a)(1)** the annual report shall describe the nature of the defect, the date the storage vessel was emptied, and the nature of an date the repair was made, except as provided in ~~paragraph (a)(3) of this~~ Condition **D.8.6(a)(3)**.

. . .

**D.9.3 General Standards. [40 CFR 63, Subpart G][326 IAC 20-16-1]**

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Pursuant to 40 CFR 63.102(a), the Permittee of sources subject to 40 CFR Part 63, Subpart F shall comply with the requirements of 40 CFR Part 63, Subparts G and H.

(a) . . .

(b) . . .

(c) . . .

(d) During start-ups, shutdowns, and malfunctions when the requirements of 40 CFR Part 63, Subpart F, Subparts G and/or H do not apply pursuant to ~~paragraphs (a) through (c)~~ **Conditions D.9.3 (a) through (c)**, the Permittee shall implement, to the extent reasonably available, measures to prevent or minimize excess emissions to the extent practical. The term "excess emissions" means emissions in excess of those that would have occurred if there were no start-up, shutdown, or malfunction and the Permittee complied with the relevant provisions of 40 CFR Part 63, Subpart F, Subparts G and/or H. The measures to be taken shall be identified in the applicable start-up, shutdown, and malfunction plan, and may include, but are not limited to, air pollution control technologies, recovery technologies, work practices, pollution prevention, monitoring, and/or changes in the manner of operation of the source. Back-up control devices are not required, but may be used if available.

. . .

**D.9.5 Requirements for Heat Exchange Systems [326 IAC 20] [40 CFR 63, Subpart F]**

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(a) Pursuant to 40 CFR 63.104, except when one or more of the conditions specified in 40 CFR 63.104(a)(1) through (a)(6) are met, the Permittee shall monitor each heat exchange system subject to 40 CFR 63.104 according to the provisions in either ~~paragraph (b) or (c) of this~~ Condition **D.9.5 (b) or (c)**. Whenever a leak is detected, the Permittee shall comply with the requirements in ~~paragraph (d) of this~~ **Condition D.9.5(d)**.

- (b) If the Permittee elects to comply with the requirements of ~~paragraph (a) of this Condition D.9.5(a)~~ by monitoring the cooling water for the presence of one or more organic hazardous air pollutants or other representative substances whose presence in cooling water indicates a leak, then the Permittee shall comply with the requirements of 40 CFR 63.104(b)(1) through (b)(6). The cooling water shall be monitored for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system.
- (c) If the Permittee elects to comply with the requirement of ~~paragraph (a) of this section Condition D.9.5(a)~~ by monitoring using a surrogate indicator of heat exchange system leaks, the Permittee shall comply with the requirements specified in 40 CFR 63.104(c)(1) through (c)(3). Surrogate indicators that could be used to develop an acceptable monitoring program are ion specific electrode monitoring, pH, conductivity or other representative indicators.
- (d) If a leak is detected, the Permittee shall comply with the following requirements, except as provided in ~~paragraph (e) of this Condition D.9.5(e)~~.

...

D.9.7 Process Wastewater Provisions [326 IAC 20] [40 CFR 63, Subpart G]

- (a) ...
- (b) If at any time the statements in ~~paragraph (1) or (2) Condition D.9.7(b)(1) or (2)~~ exist for any wastewater stream located at Plant 27, the Permittee shall comply with the standards, monitoring, recordkeeping and reporting requirements for Group 1 wastewater streams found in 40 CFR 63, Subpart G.

...

D.9.8 Standards: Pumps in Light Liquid Service [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.163(b)(1), the Permittee shall monitor each pump monthly to detect leaks by the method specified in Condition ~~D.9.22(b) D.9.23(a)~~ and shall comply with the following requirements, except as provided in 40 CFR 63.162(b) and ~~paragraph (d) Condition D.9.8(d)~~.
  - (1) A leak is defined as an instrument reading of 1,000 parts per million or greater.
  - (2) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected.
- (b) (1) Pursuant to 40 CFR 63.163(c)(1), when a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in ~~paragraph (b)(3) of this Condition D.9.8 (b)(3)~~ or D.9.14.
  - (2) ...
  - (3) ...
- (c) (1) ...
  - (2) ...
  - (3) ...
  - (4) Percent leaking pumps shall be determined by the following equation:

$$\%PL = ((PL - PS) / (PT - PS)) \times 100$$

where:

%PL = Percent leaking pumps

PL = Number of pumps found leaking as determined through monthly monitoring as required in ~~paragraph (a)~~ **Condition D.9.8(a)**.

PT = Total pumps in organic HAP service, including those meeting the criteria in 40 CFR 63.163(e) and 63.163(f).

PS = Number of pumps leaking within 1 month of start-up during the current monitoring period.

- (d) Pursuant to 40 CFR 63.163(j), any pump that is designated as an unsafe-to-monitor pump is exempt from the requirements of ~~paragraph (a) of this~~ **Condition D.9.8(a)** if:

...

D.9.9 Standards: Pressure Relief Devices In Gas / Vapor Service [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.165(a), except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of less than 500 parts per million above background except as provided in ~~paragraph (b) of this~~ **Condition D.9.9(b)**, as measured by the method specified in ~~Condition D.9.22(c)~~ **D.9.23(b)**.
- (b) (1) Pursuant to 40 CFR 63.165(b)(1), after each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of less than 500 parts per million above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in Condition D.9.14.
- (2) No later than 5 calendar days after the pressure release and being returned to organic HAP service, the pressure relief device shall be monitored to confirm the condition indicated by an instrument reading of less than 500 parts per million above background, as measured by the method specified in ~~Condition D.9.22(c)~~ **D.9.23(b)**.

...

D.9.11 Standards: Valves In Gas / Vapor Service and In Light Liquid Service [326 IAC 14][40 CFR 63 Subpart H]

Pursuant to 40 CFR 63.168, valves that are either in gas service or in light liquid service shall comply with the following provisions:

- (a) Pursuant to 40 CFR 63.168(b), the Permittee shall monitor all valves, except as provided in Condition D.9.14 and ~~paragraphs (f) and (g) of this~~ **Conditions D.9.11(f) and D.9.11(g)**, at the intervals specified in ~~paragraph~~ **Condition D.9.11 (b)**.
- (1) The valves shall be monitored to detect leaks by the method specified in ~~Condition D.9.22(b)~~ **(a)**.
- (2) A leak is defined as an instrument reading of 500 parts per million or greater.
- (b) Pursuant to 40 CFR 63.168(d), the Permittee shall monitor valves for leaks at the intervals specified below:
- (1) At process units with 2 percent or greater leaking valves, calculated according to ~~paragraph~~ **Condition D.9.11(c)**, the Permittee shall either:

- (i) Monitor each valve once per month; or
  - (ii) Implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175(d) or (e) and monitor quarterly.
- (2) At process units with less than 2 percent leaking valves, the Permittee shall monitor each valve once each quarter, except as provided in ~~paragraphs~~ **Conditions D.9.11(b)(3) and D.9.11(b)(4)**.
  - (3) At process units with less than 1 percent leaking valves, the Permittee may elect to monitor each valve once every 2 quarters.
  - (4) At process units with less than 0.5 percent leaking valves, the Permittee may elect to monitor each valve once every 4 quarters.
- (c) Pursuant to 40 CFR 63.168(e)(1), the percent leaking valves at a process unit shall be determined by the following equation:

$$\%VL = (VL / (VT + VC)) \times 100$$

where:

%VL = Percent leaking valves as determined through periodic monitoring required in ~~paragraphs~~ **Conditions D.9.11 (a) through (b)**.

VL = Number of valves found leaking excluding non-repairables as provided in paragraph (c)(2)(i).

VT = Total valves monitored, in a monitoring period excluding valves monitored as required by paragraph (d)(3).

VC = Optional credit for removed valves =  $0.67 \times$  net number (i.e., total removed-total added) of valves in organic HAP service removed from process unit after the date set forth in 40 CFR 63.100(k) of Subpart F for existing process units, and after the date of initial start-up for new sources. If credits are not taken, then VC = 0.

- (1) For use in determining monitoring frequency, the percent leaking valves shall be calculated as a rolling average of two consecutive monitoring periods for monthly, quarterly, or semiannual monitoring programs; and as an average of any three out of four consecutive monitoring periods for annual monitoring programs.
  - (2)
    - (i) Non-repairable valves shall be included in the calculation of percent leaking valves the first time the valve is identified as leaking and non-repairable and as required to comply with ~~paragraph~~ **Condition D.9.11(c)(2)(ii)**. Otherwise, a number of non-repairable valves (identified and included in the percent leaking calculation in a previous period) up to a maximum of 1 percent of the total number of valves in organic HAP service at a process unit may be excluded from calculation of percent leaking valves for subsequent monitoring periods.
    - (ii) If the number of non-repairable valves exceeds 1 percent of the total number of valves in organic HAP service at a process unit, the number of non-repairable valves exceeding 1 percent of the total number of valves in organic HAP service shall be included in the calculation of percent leaking valves.
- (d) (1) . . .

- (2) . . .
- (3) When a leak has been repaired, the valve shall be monitored at least once within the first 3 months after its repair.
- (i) The monitoring shall be conducted as specified in Conditions **D.9.22(a)** and **D.9.22(b)**, as appropriate **and as allowed by the rule**, to determine whether the valve has resumed leaking.
  - (ii) Periodic monitoring required by ~~paragraphs~~ **Condition D.9.11** (a) and (b) may be used to satisfy the requirements of this condition, if the timing of the monitoring period coincides with the time specified in this condition. Alternatively, other monitoring may be performed to satisfy the requirements of this condition, regardless of whether the timing of the monitoring period for periodic monitoring coincides with the specified time.
  - (iii) If a leak is detected, the Permittee shall follow the provisions of the following paragraphs, **Conditions D.9.11(d)(3)(iii)(A) and (d)(3)(iii)(B)**, to determine whether that valve must be counted as a leaking valve.
    - (A) If the Permittee elected to use periodic monitoring required by ~~paragraphs~~ **Conditions D.9.11** (a) and (b) to satisfy the requirements of ~~paragraph~~ **Condition D.9.11** (d)(3), then the valve shall be counted as a leaking valve.
    - (B) If the Permittee elected to use other monitoring, prior to the periodic monitoring required by ~~paragraph~~ **Conditions D.9.11** (a) and (b) to satisfy the requirements of ~~paragraph~~ **Condition D.9.11** (d)(3), then the valve shall be counted as a leaking valve unless it is repaired and shown by periodic monitoring not to be leaking.

. . .

D.9.12 Standards: Pumps, Valves, and Connectors in Heavy Liquid Service; Instrumentation Systems; and Pressure Relief Devices in Liquid Service [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.169(a), pumps, valves, and connectors in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and instrumentation systems shall be monitored within 5 calendar days by the method specified in Condition **D.9.22(a)** if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method. If such a potential leak is repaired as required in ~~paragraphs~~ **Conditions D.9.12** (c) and (d) ~~of this condition~~, it is not necessary to monitor the system for leaks by the method specified in Condition **D.9.22(a)**.
- (b) Pursuant to 40 CFR 63.169(b), if an instrument reading of 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured, a leak is detected.
- (c)
  - (1) Pursuant to 40 CFR 63.169(c)(1), when a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition **D.9.14**.
  - (2) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

- (3) For equipment identified in ~~paragraph (a) of this Condition~~ **D.9.12(a)** that is not monitored by the method specified in Condition D.9.22~~(b)~~ **(a)**, repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.
- (d) Pursuant to 40 CFR 63.169(d), first attempts at repair include, but are not limited to, the practices described under Conditions D.9.8~~(b)(2)~~ **(2)** and D.9.11~~(e)~~ **(e)**, for pumps and valves, respectively.

...

D.9.15 Standards: Closed-Vent Systems and Control Devices [326 IAC 14][40 CFR 63 Subpart H]

- (a) ...
- (b) ...
- (c) ...
- (d) Pursuant to 40 CFR 63.172(f), except as provided in ~~paragraphs~~ **Conditions D.9.15 (i) and (j) of this condition**, each closed-vent system shall be inspected according to the procedures and schedule specified below.
  - (1) If the closed-vent system is constructed of hard-piping, the Permittee shall:
    - (i) Conduct an initial inspection according to the procedures in ~~paragraph (e) of this Condition~~ **D.9.15(e)**, and
    - (ii) Conduct annual visual inspections for visible, audible, or olfactory indications of leaks.
  - (2) If the vapor collection system or closed-vent system is constructed of ductwork, the Permittee shall:
    - (i) Conduct an initial inspection according to the procedures in ~~paragraph (e) of this Condition~~ **D.9.15(e)**, and
    - (ii) Conduct annual inspections according to the procedures in ~~paragraph (e) of this Condition~~ **D.9.15(e)**.
- (e) Pursuant to 40 CFR 63.172(g), each closed-vent system shall be inspected according to the procedures in Condition D.9.22~~(b)~~ **(a)**.
- (f) Pursuant to 40 CFR 63.172(h), leaks, as indicated by an instrument reading greater than 500 parts per million above background or by visual inspections, shall be repaired as soon as practicable, except as provided in ~~paragraph (g) of this Condition~~ **D.9.15(g)**.
  - (1) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
  - (2) Repair shall be completed no later than 15 calendar days after the leak is detected, except as provided in ~~paragraph (g) of this Condition~~ **D.9.15(g)**.
- (g) ...
- (h) Pursuant to 40 CFR 63.172(j), for each closed-vent system that contains bypass lines that could divert a vent stream away from the control device and to the atmosphere, the

Permittee shall comply with the provisions of either ~~paragraph~~ **Condition D.9.15** (h)(1) or (h)(2), except as provided in ~~paragraph~~ **Condition D.9.15** (h)(3) ~~of this condition~~.

(1) . . .

(2) . . .

(3) Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to ~~paragraph~~ **Conditions D.9.15** (h)(1) and (h)(2) ~~of this condition~~.

(i) Pursuant to 40 CFR 63.172(k), any parts of the closed-vent system that are designated as unsafe to inspect are exempt from the inspection requirements of ~~paragraphs~~ **Conditions D.9.15** (d)(1) and (d)(2) ~~of this condition~~ if:

(1) The Permittee determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with ~~paragraphs~~ **Conditions D.9.15** (d)(1) and (d)(2); and

(2) The Permittee has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually.

(j) Pursuant to 40 CFR 63.172(l), any parts of the closed-vent system that are designated as difficult to inspect are exempt from the inspection requirements of ~~paragraphs~~ **Conditions D.9.15** (d)(1) and (d)(2) if:

. . .

**D.9.16 Standards: Connectors In Gas / Vapor Service and In Light Liquid Service [326 IAC 14][40 CFR 63 Subpart H]**

(a) Pursuant to 40 CFR 63.174(a), the Permittee of a process unit subject to 40 CFR Part 63, Subpart H shall monitor all connectors in gas/vapor and light liquid service, except as provided in 40 CFR 63.162(b), and in ~~paragraphs (e) and (g) of this~~ **Conditions D.9.16(e) and D.9.16(g)**, at the intervals specified in ~~paragraph~~ **Condition D.9.16(b)**.

(1) The connectors shall be monitored to detect leaks by the method specified in ~~Condition D.9.22(b)~~ **(a)**.

(2) If an instrument reading greater than or equal to 500 parts per million is measured, a leak is detected.

(b) Pursuant to 40 CFR 63.174(b), the Permittee shall monitor for leaks at the intervals specified in below:

(1) The Permittee shall monitor all connectors, except as provided in ~~paragraphs (e) through (g) of this~~ **Conditions D.9.16(e) and (g)**.

(2) The Permittee shall perform monitoring of connectors at the frequencies specified in ~~paragraphs~~ **Conditions D.9.16(b)(2)(i) through (b)(2)(v)**, except as provided in ~~paragraph~~ **Condition D.9.16(c)(2)**:

(i) . . .

(ii) . . .

(iii) . . .

- (iv) If a process unit complying with the requirements of ~~paragraph~~ **Condition D.9.16(b)** using a 4-year monitoring interval program has greater than or equal to 0.5 percent but less than 1 percent leaking connectors, the Permittee shall increase the monitoring frequency to one time every 2 years. The Permittee may comply with the requirements of this condition by monitoring at least 40 percent of the connectors in the first year and the remainder of the connectors in the second year. The Permittee may elect to use the provisions of ~~paragraph~~ **Condition D.9.16(b)(2)(iii)** when the percent leaking connectors decreases to less than 0.5 percent.
- (v) If a process unit complying with requirements of ~~paragraph~~ **Condition D.9.16(b)(2)(iii)** using a 4-year monitoring interval program has 1 percent or greater leaking connectors, the Permittee shall increase the monitoring frequency to one time per year. The Permittee may elect to use the provisions of ~~paragraph~~ **Condition D.9.16(b)(2)(iii)** when the percent leaking connectors decreases to less than 0.5 percent.
- (c)
  - (1)
    - (i) Pursuant to 40 CFR 63.174(c)(1)(i), except as provided in ~~paragraph~~ **Condition D.9.16(c)(1)(ii)**, each connector that has been opened or has otherwise had the seal broken shall be monitored for leaks when it is reconnected or within the first 3 months after being returned to organic hazardous air pollutants service. If the monitoring detects a leak, it shall be repaired according to the provisions of ~~paragraph~~ **Condition D.9.16(d)** of this condition, unless it is determined to be non-repairable, in which case it is counted as a non-repairable connector for the purposes of ~~paragraph~~ **Condition D.9.16(h)(2)**.
    - (ii) As an alternative to the requirements in ~~paragraph~~ **Condition D.9.16(c)(1)(i)**, the Permittee may choose not to monitor connectors that have been opened or otherwise had the seal broken. In this case, the Permittee may not count non-repairable connectors for the purposes of ~~paragraph~~ **Condition D.9.16(h)(2)**. The Permittee shall calculate the percent leaking connectors for the monitoring periods described in ~~paragraph~~ **Condition D.9.16(b)**, by setting the non-repairable component, CAN, in the equation in ~~paragraph~~ **Condition D.9.16(h)(2)** to zero for all monitoring periods.
    - (iii) The Permittee may switch alternatives described in ~~paragraphs~~ **Conditions D.9.16 (c)(1)(i) and (c)(1)(ii)** at the end of the current monitoring period, provided that it is reported as required in ~~Condition D.9.25~~ **D.9.34** and begin the new alternative in annual monitoring. The initial monitoring in the new alternative shall be completed no later than 12 months after reporting the switch.
  - (2) As an alternative to the requirements of ~~paragraph~~ **Condition D.9.16(b)(3)** of this condition, each screwed connector 2 inches or less in nominal inside diameter may:
    - (i) Comply with the requirements of Condition D.9.12 and
    - (ii) Be monitored for leaks within the first 3 months after being returned to organic hazardous air pollutants service after having been opened or otherwise had the seal broken. If that monitoring detects a leak, it shall be repaired according to the provisions of ~~paragraph~~ **Condition D.9.16(d)** of this condition.
- (d) Pursuant to 40 CFR 63.174(d), when a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as

provided in ~~paragraph~~ **Condition D.9.16(f) of this condition** and in Condition D.9.14. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.

- (e) Pursuant to 40 CFR 63.174(f), any connector that is designated as an unsafe-to-monitor connector is exempt from the requirements of ~~paragraph~~ **Condition D.9.16(a) of this condition** if:
  - (1) The Permittee determines that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with ~~paragraphs (a) through (d) of this~~ **Conditions D.9.16 (a) through (d)**; and
  - (2) The Permittee has a written plan that requires monitoring of the connector as frequently as practicable during safe to monitor periods, but not more frequently than the periodic schedule otherwise applicable.
  
- (f) Pursuant to 40 CFR 63.174(g), any connector that is designated as an unsafe-to-repair connector is exempt from the requirements of ~~paragraphs~~ **Conditions D.9.16 (a) and (d) of this condition** if:
  - (1) The Permittee determines that repair personnel would be exposed to an immediate danger as a consequence of complying with ~~paragraph~~ **Condition D.9.16(d) of this condition**; and
  - (2) The connector will be repaired before the end of the next scheduled process unit shutdown.
  
- (g) (1) Pursuant to 40 CFR 63.174(h)(1), any connector that is inaccessible or is ceramic or ceramic-lined (e.g., porcelain, glass, or glass-lined), is exempt from the monitoring requirements of ~~paragraphs~~ **Conditions D.9.16 (a) and (c) of this condition** and from the recordkeeping and reporting requirements of Conditions D.9.33 and D.9.25. An inaccessible connector is one that is:
  - (i) Buried;
  - (ii) Insulated in a manner that prevents access to the connector by a monitor probe;
  - (iii) Obstructed by equipment or piping that prevents access to the connector by a monitor probe;
  - (iv) Unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold which would allow access to connectors up to 7.6 meters (25 feet) above the ground;
  - (v) Inaccessible because it would require elevating the monitoring personnel more than 2 meters above a permanent support surface or would require the erection of scaffold; or
  - (vi) Not able to be accessed at any time in a safe manner to perform monitoring. Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where an ignition potential exists, or access would require near proximity to hazards such as electrical lines, or would risk damage to equipment.
  
- (2) If any inaccessible or ceramic or ceramic-lined connector is observed by visual, audible, olfactory, or other means to be leaking, the leak shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected,

except as provided in Condition D.9.14 and ~~paragraph~~ **Condition D.9.16(f)** of ~~this condition~~.

- (3) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
- (h) Pursuant to 40 CFR 63.174(i), for use in determining the monitoring frequency, as specified in ~~paragraph~~ **Condition D.9.16(b)** of ~~this condition~~, the percent leaking connectors shall be calculated as specified below:

$$\% \text{ CL} = [(CL - \text{CAN}) / (\text{Ct} + \text{CC})] \times 100$$

where:

% CL = Percent leaking connectors as determined through periodic monitoring required in Conditions D.9.16(a) and D.9.16(b).

CL = Number of connectors, including non-repairables, measured at 500 parts per million or greater, by the method specified in Condition D.9.22(~~b~~) **(a)**.

CAN = Number of allowable non-repairable connectors, as determined by monitoring required in Conditions D.9.16(b)(3) and D.9.16(c), not to exceed 2 percent of the total connector population, Ct.

Ct = Total number of monitored connectors, including non-repairables, in the process unit.

CC = Optional credit for removed connectors =  $0.67 \times$  net number (i.e., total removed—total added) of connectors in organic hazardous air pollutants service removed from the process unit after the compliance date set forth in the applicable subpart for existing process units, and after the date of initial start-up for new process units. If credits are not taken, then CC = 0.

- (i) Pursuant to 40 CFR 63.174(j), if the Permittee eliminates a connector subject to monitoring under ~~paragraph~~ **Condition D.9.16(b)** of ~~this condition~~, the Permittee may receive credit for elimination of the connector, as described in ~~paragraph~~ **Condition D.9.16(h)** of ~~this condition~~, provided the following requirements are met.

- (1) The integrity of the weld is demonstrated by monitoring it according to the procedures in Condition D.9.22(~~b~~) **(a)** or by testing using X-ray, acoustic monitoring, hydrotesting, or other applicable method.
- (2) Welds are monitored or tested within 3 months after being welded.
- (3) If an inadequate weld is found or the connector is not welded completely around the circumference, the connector is not considered a welded connector and is therefore not exempt from the provisions of 40 CFR Part 63, Subpart H.

D.9.17 Requirements for Maintenance Wastewater [326 IAC 20][40 CFR 63, Subpart F]

Pursuant to 40 CFR 63.105, the Permittee shall comply with the requirements of ~~paragraphs~~ **Conditions D.9.17** (a) through (d) of ~~this condition~~ for maintenance wastewater containing the organic HAP's listed in Table 9 of 40 CFR 63, Subpart G.

- (a) . . .
- (b) The Permittee shall modify and update the information required by ~~paragraph~~ **Condition D.9.17** (a) of ~~this condition~~ as needed following each maintenance procedure based on

the actions taken and the wastewater generated in the preceding maintenance procedure.

- (c) The Permittee shall implement the procedures described in ~~paragraphs~~ **Conditions D.9.17** (a) and (b) ~~of this condition~~ as part of the start-up, shutdown, and malfunction plan required under 40 CFR 63.6(e)(3).
- (d) The Permittee shall maintain a record of the information required by ~~paragraphs~~ **Conditions D.9.17** (a) and (b) ~~of this condition~~ as part of the start-up, shutdown, and malfunction plan required under 40 CFR 63.6(e)(3).

...

D.9.21 Monitoring Requirements: Process Vent Provisions [326 IAC 20] [40 CFR 63, Subpart G]

- (a) ...
- (b) Pursuant to 40 CFR 63.114(d), the Permittee shall comply with ~~paragraphs~~ **Conditions D.9.21** (b)(1) or (b)(2) for any bypass line between the origin of the gas stream (i.e., at an air oxidation reactor, distillation unit, or reactor) and the point where the gas stream reaches the process vent that could divert the gas stream directly to the atmosphere. Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to condition.
  - (1) Properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. Records shall be generated as specified in Condition D.9.30(a)~~(3)~~. The flow indicator shall be installed at the entrance to any bypass line that could divert the gas stream to the atmosphere; or

...

D.9.22 Test Methods and Procedures Equipment Leaks [326 IAC 14][40 CFR 63 Subpart H]

Pursuant 40 CFR 63.180(a), the Permittee shall comply with the following test methods and procedures:

- (a) ...
- (b) Pursuant 40 CFR 63.180(c), when equipment is monitored for compliance as required in 40 CFR 63.164(i), Conditions D.9.9(a), and D.9.15(d) or when equipment subject to a leak definition of 500 ppm is monitored for leaks, the Permittee may elect to adjust or not to adjust the instrument readings for background. If the Permittee elects to not adjust instrument readings for background, the Permittee shall monitor the equipment according to the procedures specified in 40 CFR 63.180(b)(1) through (b)(4). In such case, all instrument readings shall be compared directly to the applicable leak definition to determine whether there is a leak. If the Permittee elects to adjust instrument readings for background, the Permittee shall monitor the equipment according to the procedures specified in 40 CFR 63.180(c)(1) through ~~D.9.22~~(c)(4).
- (c) ...
- (d) The Permittee may use good engineering judgment rather than the procedures in ~~paragraph~~ **Condition D.9.22**(c) to determine that the percent organic HAP content does not exceed 5 percent by weight. When the Permittee and IDEM, OAQ do not agree on whether a piece of equipment is not in organic HAP service, however, the procedures in paragraph (c) shall be used to resolve the disagreement. Conversely, the Permittee may determine that the organic HAP content of the process fluid does not exceed 5 percent by weight by, for example, accounting for 98 percent of the content and showing that organic HAP is less than 3 percent.

- (e) If the Permittee determines that a piece of equipment is in organic HAP service, the determination can be revised after following the procedures in ~~paragraph~~ **Condition D.9.22** (c), or by documenting that a change in the process or raw materials no longer causes the equipment to be in organic HAP service.

...

D.9.28 General Compliance, Reporting, and Recordkeeping provisions [40 CFR 63, Subpart G][326 IAC 20-16-1]

- (a) ...
- (b) The Permittee shall keep records of the following:
  - (1) Records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment or of air pollution control equipment or continuous monitoring systems used to comply with 40 CFR Part 63, Subpart F, Subpart G, or H during which excess emissions (as defined in Condition D.9.3~~(a)(4)~~**(d)**) occur.
  - (2) For each start-up, shutdown, and malfunction during which excess emissions (as defined in Condition D.9.3~~(a)(4)~~**(d)**) occur, records that the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. For example, if a start-up, shutdown, and malfunction plan includes procedures for routing a control device to a backup control device (e.g., the incinerator for a halogenated stream could be routed to a flare during periods when the primary control device is out of service), records must be kept of whether the plan was followed. These records may take the form of a "checklist," or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event.

...

D.9.29 Reporting and Recordkeeping: Process Vent Provisions, Requirements for Group and TRE Determinations and Performance Tests [326 IAC 20] [40 CFR 63, Subpart G]

- (a) Pursuant to 40 CFR 63.117(a), the Permittee shall keep an up-to-date, readily accessible record of the data specified in ~~paragraphs~~ **40 CFR 63.117** (a)(1) through (a)(3), as applicable, and if any subsequent TRE determinations or performance tests are conducted, report the data in specified in ~~paragraphs~~ **40 CFR 63.117** (a)(1) through (a)(3) in the next Periodic Report.

...

D.9.31 Process Wastewater Provisions – Recordkeeping [326 IAC 20] [40 CFR 63, Subpart G]

- (a) ...
- (b) Pursuant to 40 CFR 63.147(f), if the Permittee uses process knowledge to determine the annual average concentration of a wastewater stream as specified in 40 CFR 63.144(b)**(1)** and/or uses process knowledge to determine the annual average flow rate as specified in 40 CFR 63.144(c)**(1)**, and determines that the wastewater stream is not a Group 1 wastewater stream, the Permittee shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream.

...

D.9.33 Recordkeeping Requirements for Equipment Leaks [326 IAC 14][40 CFR 63 Subpart H]

- (a) ...
- (b) ...

- (c) Pursuant to 40 CFR 63.181(c), for visual inspections of equipment subject to the provisions of 40 CFR Part 63, Subpart H, the Permittee shall document that the inspection was conducted and the date of the inspection. The Permittee shall maintain records as specified in ~~paragraph~~ **Condition D.9.33(d)** of ~~this condition~~ for leaking equipment identified in this inspection. These records shall be retained for 2 years.

...

**D.9.34 Reporting requirements for Equipment Leaks [326 IAC 14][40 CFR 63 Subpart H]**

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- (a) Pursuant to 40 CFR 63.182(d), the Permittee shall submit Periodic Reports.
  - (1) A report containing the information in ~~paragraphs~~ **Conditions D.9.34** (a)(2), (a)(3), and (a)(4) shall be submitted semiannually as required in 40 CFR 63.182(c).
  - (2) For each process unit complying with the provisions of 40 CFR 63, Subpart H, the summary information listed below for each monitoring period during the 6-month period.
    - (i) ...
    - (ii) ...
    - (iii) ...
    - (iv) ...
    - (v) ...
    - (vi) ...
    - (vii) ...
    - (viii) ...
    - (ix) If applicable, the initiation of a monthly monitoring program under Condition D.9.11(e) ~~(b)~~(1)(i), or a quality improvement program under either 40 CFR 63.175 or 63.176.

...

**D.10.3 General Standards for 40 CFR 61, Subpart V [60 CFR 61.242-1] [40 CFR 61, Subpart J] [326 IAC 14]**

---

Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.242-1, the Permittee shall comply with the following requirements:

- (a) ...
- (b) Equipment that is in vacuum service is excluded from the requirements of Conditions D.10.4 through D.10.7 if it is identified as required in Condition ~~D.10.10(d)(4)~~ **D.10.9(d)(4)**.
- (c) The definitions in 40 CFR 61, Subpart J, Section 61.111 are applicable to the Permittee.

**D.10.4 Standards: Pumps [40 CFR 61.242-2] [40 CFR 61, Subpart J] [326 IAC 14]**

---

Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.242-2, pumps subject to the requirements of 40 CFR 61, Subpart J shall comply with the following requirements:

- (a) ...
- (b) ...
- (c) ...
- (d) Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of Conditions D.10.4(a) and (b), provided the following requirements are met:

...

(6) (A) ...

(B) If indications of liquids dripping from the pump seal exceed the criteria established in Condition ~~D.10.4(d)(6)(i)~~ **D.10.4(d)(6)(A)**, or if, based on the criteria established in Condition ~~D.10.4(d)(6)(i)~~ **D.10.4(d)(6)(A)**, the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.

...

(e) Any pump that is designated, as described in Condition ~~D.10.10(d)(2)~~ **D.10.9(d)(2)(A)**, for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of Condition D.10.4(a), (c), and (d) if the pump:

...

(f) Any pump that is designated, as described in Condition ~~D.10.10(e)(4)~~ **D.10.9(e)(1)**, as an unsafe-to-monitor pump is exempt from the monitoring and inspection requirements of Condition D.10.4(a) and (d)(4) through (d)(6) if:

...

#### D.10.6 Standards: Valves [40 CFR 61.242-7] [40 CFR 61, Subpart J] [326 IAC 14]

Pursuant to 40 CFR 61, Subpart J and 40 CFR 61.242-7, valves subject to the requirements of 40 CFR 61, Subpart J shall comply with the following requirements:

...

(f) Any valve that is designated, as described in Condition ~~D.10.10(d)(2)~~ **D.10.9(d)(2)**, for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of Condition D.10.6(a) if the valve:

...

(g) Any valve that is designated, as described in Condition ~~D.10.10(e)(4)~~ **D.10.9(e)(1)**, as an unsafe-to-monitor valve is exempt from the requirements of Condition D.10.6(a) if:

...

(h) Any valve that is designated, as described in Condition ~~D.10.10(e)(2)~~ **D.10.9(e)(2)**, as a difficult-to-monitor valve is exempt from the requirements of Condition D.10.6(a) if:

...

#### D.10.10 Reporting Requirements [40 CFR 61.247] [40 CFR 61, Subpart J] [326 IAC 14]

Pursuant to 40 CFR 61, Subpart J and 40 CFR 60.247, the Permittee shall comply with the following reporting requirements:

...

(c) An application for approval of construction or modification under 40 CFR 61.05(a) and 61.07 shall not be required provided:

(1) The new source complies with the standards in 40 CFR 61.242;

(2) The new source is not part of the construction of a process unit; and

- (3) In the next semiannual report required by Condition ~~D.10.11(a)~~ **D.10.10(a)**, the information in 40 CFR 61.247(a)(5) is reported.

...

**D.12.2 General Standards for 40 CFR 63, Subpart GGG [40 CFR 63.1252]**

---

- (a) Opening of a safety device. Opening of a safety device, as defined in 40 CFR 63.1251, is allowed at any time conditions require it to do so to avoid unsafe conditions.
- (b) Closed-vent systems. Closed-vent systems that contain bypass lines that could divert a vent stream away from a control device used to comply with the requirements in 40 CFR 63.1253, 63.1254, and 63.1256 shall comply with the requirements of Table 4 of 40 CFR 63, Subpart GGG and ~~paragraph Condition D.12.2 (b)(1) or (2) of this condition.~~ Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, rupture disks and pressure relief valves needed for safety purposes are not subject to this condition.
- ...
- (c) Heat exchange systems. Except as provided in ~~paragraph Condition D.12.2 (c)(2) of this condition,~~ the Permittee shall comply with the requirements in ~~paragraph Condition D.12.2 (c)(1) of this condition~~ for heat exchange systems that cool process equipment or materials used in pharmaceutical manufacturing operations.

...

**D.12.5 Equipment Leaks Standard [40 CFR 63.1255]**

---

- ...
- (e) As an alternative to complying with ~~paragraphs Conditions D.12.5 (d)(1) through D.12.5 (d)(6) and D.12.5 (d)(8) through D.12.5 (d)(10) of this condition,~~ system components may comply with 40 CFR 63.1255(b)(4)(iv).
- (f) Pursuant to 40 CFR 63.1255(b)(3), which references 40 CFR 63.179 (Alternative means of emission limitation: Enclosed-vented process units), process units enclosed in such a manner that all emissions from equipment leaks are vented through a closed-vent system to a control device meeting the requirements of 40 CFR 63.172 and 40 CFR 1255(b)(4)(ii) are exempted from the requirements of 40 CFR 63.163 through 171, and 40 CFR 63.173 through 174 as referenced by 40 CFR 63.1255. The enclosure shall be maintained under a negative pressure at all times while the process unit is in operation to ensure that all emissions are routed to the control device. The closed vent system and control device must comply with the requirements in ~~paragraph Condition D.12.5 (d)(7) of this condition.~~

**Response to General Comment 1:**

The requested changes have been made, except to Section D.12, which has been modified as noted in response to specific comment 35.

**General Comment 2:**

Reilly Industries, Inc. has performed lengthy calculations of all of the HAP emitting processes at the source under worst case conditions. Reilly Industries, Inc. has provided emission inventory results of our current Potential to Emit to OES in separate correspondence. This analysis shows that the plant wide PTE for HAPs is less than the major source levels of 10 tons per year for any single HAP or 25 tons per year for all HAPs. A number of new NESHAP regulations do not apply to our facility, since Reilly Industries, Inc. is not a major source of HAPs as indicated in the TSD. In addition, 40 CFR 61, Subpart E, National Emission Standard for Mercury does not apply, because Reilly Industries, Inc. is removing the

sludge dryer from the facility. Specifically, Reilly Industries, Inc. believes that the following standards do not apply and the sections of the permit associated with those standards should be deleted from the permit. Reilly Industries, Inc. would also request that Condition B.12 be amended to clearly identify the standards as not applicable to our facility.

Non-applicable NESHAPs Standard	Sections of the permit to be deleted
40 CFR 63, Subpart DDDDD, Industrial and Commercial Heaters and Boilers	D.1.3, D.1.4, D.1.9, D.2.3, D.2.4, D.2.8, D.3.3, D.3.4, D.3.7, D.4.5, D.4.6, D.4.11, D.5.3, D.5.4, and D.5.8
40 CFR 63 Subpart FFFF, Miscellaneous Organic NESHAPs	D.6.2 and D.6.15
40 CFR 63 Subpart EEEE, Organic Liquid Distribution	D.9.1(b), (e), and (?), D.9.2, and D.9.37
40 CFR 63 Subpart GGGGG, Site Remediation	D.13
40 CFR 61 Subpart E, Mercury Emission Standard	D.6.1(b), D.6.4, D.6.5, D.6.8, D.6.12, and D.6.15

**Response to General Comment 2:**

Reilly Industries, Inc. did submit a complete set of HAPs calculations. In these calculations, Reilly Industries, Inc. included control efficiencies of the control devices used to meet emissions limitations established in other NESHAP requirements. The control devices may be included in the calculations only to the efficiency required and made enforceable by the applicable rules. Even if Reilly Industries, Inc. has opted to maintain a control efficiency greater than that which is currently required, they may not use the actual efficiency in the calculations for potential to emit. However, they may use these control efficiencies in their limited potential emissions calculations if the efficiencies are made federally enforceable by a condition in their Part 70 Operating Permit. In addition, Reilly Industries, Inc. included in their calculations, HAP control efficiencies on boilers, identified as 28-186N, 30-2726S, and 70-2722W, located at Plant 29. Reilly Industries, Inc. at this time has no emissions limit that requires such a control on the boilers except those established by their Resource Conservation and Recovery Act (RCRA). However, Reilly Industries, Inc. has not demonstrated compliance with these RCRA requirements to OES. Without this control device, the emission level of HAPs is well above the threshold level of 10 tons per year for a single HAP and 25 tons per year of combined HAPs for these boilers alone as shown in the table below.

Emission Unit	Limited Potential to Emit (tons/yr)				Total
	Maximum Single HAP				
	Benzene	Toluene	Methanol	Cyanide	
Plant 27	32.38				43.16
Plant 29		3,671			8,638
Plant 40			1.33		3.21
Plant 41				30.66	31.51
Plant 47		2.27			2.36
Plant 48		3.19			3.42
Plant 49			0.31		0.41
Total		3,677			8,722

If, in the future, Reilly Industries, Inc. does request that emissions limits be placed on these boilers, as well as other HAP emission units, such that source-wide potential emissions are less than ten tons per year of a single HAP and 25 tons per year of a combination of HAPs, they may at that time apply for a permit modification. Furthermore, Reilly Industries, Inc. uses maximum throughputs and production rates for several emission units without the origin of these rates. If these throughputs are actually based on operational or process limitations, they must be included in the process descriptions if the permit is modified. If these throughputs are not based on operational or process limitations, these limitations must be established in the permit to limit the emissions from these facilities. If Reilly Industries, Inc. does apply for a permit modification the origin of these throughputs and production rates must be included. However, 40 CFR 63, Subpart GGGGG, Site Remediation requirements have been removed from the permit for reasons explained in Specific Comment/Response 38. All requirements for and references to the sludge

dryer have been removed. The description of the wastewater treatment plant in Section A.2(i) and Section D.6 (i) have been revised as follows:

Wastewater handling operations, including one (1) Wastewater Treatment Plant, constructed in 1979, having a nominal throughput capacity of 350 gallons of wastewater per minute. The Wastewater Treatment Plant treats wastewater from Plants 27, 38, 40, 41, 47, and 48 and offsite wastewater. Plant sewers are pumped to wastewater storage tanks for processing. Depending on the contents of the wastewater, the wastewater may be pH adjusted, clarified, filtered, and/or steam stripped as needed prior to discharge to the POTW. The Wastewater Treatment Plant consists of one (1) large surge volume tank (identified as the North API), four (4) wastewater storage tanks (identified as tanks 15, 16, 17, and 18), one (1) neutralization tank, one (1) clarification/flocculation tank, one (1) plate and frame filter press, and one (1) steam stripper for press filtrate. ~~The plant also has a 78,750 Btu/ft<sup>3</sup> sludge dryer that is not currently in use.~~ The wastewater operations consist of two (2) Group 2 wastewater streams identified as 140 Bottoms (ammonia stripper bottoms) and 75 Flow (raffinate stripper bottoms).

The following changes have also been made:

~~D.6.1 General Provisions Relating to NESHAPs [326 IAC 20-1] [40 CFR 63, Subpart A] [326 IAC 14] [40 CFR 61, Subpart A]~~

- ~~(a) The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the Wastewater Treatment Plant except when otherwise specified in 40 CFR 63, Subpart DD.~~
- ~~(b) The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14, apply to the sludge dryer except when otherwise specified in 40 CFR 61, Subpart E.~~

...

~~D.6.4 Mercury Emission Standard [40 CFR 61, Subpart E][326 IAC 14]~~

- ~~(a) Pursuant to 40 CFR 61.52(b), emissions of mercury to the atmosphere from the sludge dryer shall not exceed 7.1 pounds per 24-hour period.~~
- ~~(c) Pursuant to 40 CFR 61.55(a), if the mercury emissions from the sludge dryer exceed 3.5 pounds per 24-hour period, as demonstrated using either the stack sampling procedure in 40 CFR 61.53(d) or the sludge sampling procedure in 40 CFR 61.54, the Permittee shall monitor mercury emissions at intervals of at least once per year by use of Method 105 of 40 CFR Part 61, Appendix B or the procedures specified in 40 CFR 61.53(d)(2) and (4).~~

~~D.6.5 Particulate Emission Limitation [326 IAC 6-1-2(a)]~~

~~Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the sludge dryer shall be limited to 0.03 grains per dry standard cubic foot.~~

...

~~D.6.8 Mercury Sampling Requirements [40 CFR 61.53 and 54][326 IAC 14]~~

~~To demonstrate compliance with the mercury emission standard in Condition D.6.3, the Permittee shall test emissions from the sludge dryer using:~~

- ~~(a) Method 101A in 40 CFR Part 61 and the procedures outlined in 40 CFR 61.53(d); or~~
  - ~~(b) Method 105 in 40 CFR Part 61 and the procedures outlined in 40 CFR 61.54.~~
- ~~No changes shall be made in the operation which would potentially increase emissions above the level determined in the most recent stack test or sludge test, until the new emission level has been estimated by calculation and the results reported to the IDEM, OAQ.~~

...

~~D.6.12 Recordkeeping and Reporting Requirements [40 CFR 61, Subpart E][326 IAC 14]~~

- ~~(a) To demonstrate compliance with Condition D.6.4, the Permittee shall report the results of each determination to IDEM, OAQ by a registered letter within 15 calendar days following the date the determination was completed [40 CFR 61.53(d)(5) and 61.54(f)].~~
- ~~(b) Pursuant to 40 CFR 61.53(d)(6) and 61.54(g), the Permittee shall maintain records of emission test results, sludge sampling, sludge charging rate determination, and other data needed to determine compliance with the mercury emission standard in Condition D.6.4.~~
- ~~(c) To demonstrate compliance with Condition D.6.4, the Permittee shall report the results of monitoring required by 40 CFR 61.55(a) to IDEM, OAQ by registered letter within 15 calendar days following the date the determination is complete. The Permittee shall maintain all monitoring records.~~
- ~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

...

~~D.6.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]~~

~~The Permittee shall submit a applications for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit. The significant permit modification applications shall be submitted to:~~

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

~~and~~

~~City of Indianapolis, Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221~~

**General Comment 3:**

A request for a revision to the 326 IAC 6-1-12, State Implementation Plan (SIP), was submitted on May 14, 2003 to the Indiana Department of Environmental Management. This request included a combined TSP ton per year limit and a combined pound per MMBtu limit for the boilers identified as 2722W, 2726S, and 186N. Reilly Industries, Inc. would like to request that the Part 70 permit include the limits contained in the request for a SIP revision, and note that the SIP revision is currently being considered in order to correct past errors and inconsistencies in the SIP. The draft Part 70 permit does not include the language from the SIP request, nor does it incorporate the current SIP language.

The draft Part 70 provides requirements for boiler ID 186N to burn natural gas only and that is incorrect. 0049-21/Boiler ID 11-112E has current PM limits of less than 0.05 for each the lb per MMBtu and lb per hour. 0049-01/Boiler ID 28-186N has current SIP limits of 0.9 tons per year and 0.011 lb per MMBtu, however the SIP revision request proposes a new limit for 2722W, 2726S, and 186N combined. Further, Section D.5 repeats the same error described above by indicating that 722804, BM2724W, FC2607T, and AL2713W are restricted to combusting natural gas only. Reilly Industries, Inc. would like to request that these units have limits established under the SIP.

**Response to General Comment 3:**

IDEM and OES are aware that Reilly Industries, Inc. has requested a revision to the State Implementation Plan (SIP). The requested changes were adopted by the Indiana Air Pollution Control Board in November 2004, but are not yet effective at the state level, nor have they been approved by the USEPA as a revision to the SIP. Therefore, the revision will not be reflected in this Part 70 Operating Permit. Reilly Industries, Inc. may apply for a permit modification once the SIP revision is adopted as final, at which point, this request will be incorporated into the Operating Permit.

Pursuant to 326 IAC 6-1-12 as it is currently written, boilers 186N, 722804, BM2724W, FC2607T, and AL2713W are all restricted to combusting natural gas only. Also pursuant to 326 IAC 6-1-12 as it is currently written, boiler 11-112E has current PM limits of less than 0.5 tons per year, and 0.15 pounds per million Btu (lbs/MMBtu), as is correctly stated in the permit. No changes will be made as a result of this comment.

#### **Specific Comment 1:**

Sections A.2(a) and D.1(a): The facility description includes a waste gas incinerator used in Plant 41. However, by technical definition this is a flare and not an incinerator. Further EU 11-112E is used to recover waste heat from the flare at Plant 41.

#### **Response to Specific Comment 1:**

Pursuant to 326 IAC 1-2-34, an incinerator is "An engineered apparatus that burns waste substances with controls on combustion factors, including, but not limited to, temperature, retention time, and air." Pursuant to 326 IAC 1-2-29, a flare is "an elevated combustion device that burns waste gases." Because the unit in question does burn waste gases rather than solid materials, IDEM, OAQ, and OES agree that the unit more closely meets the definition of a flare. Sections A.2(a) and D.1(a) have been revised as follows:

- (a) One (1) natural gas-fired boiler (identified as unit 11-112E) having a maximum heat input capacity of 14.4 MMBtu per hour, used to recover waste heat from the ~~Plant 44 waste gas incinerator~~ **flare** (identified as unit CP41GCS) **at Plant 41**. This boiler was constructed in 1953 and exhausts to stack S-29-001.

#### **Specific Comment 2:**

Sections A.2(c) and D.1(c): The actual maximum heat input capacity is 39.3 MMBtu/hr as stated in the July 8, 1991 operating permit.

#### **Response to Specific Comment 2:**

Sections A.2(c) and D.1(c) has been revised as follows:

One (1) boiler (identified as unit 30-2726S) having a maximum heat input capacity of ~~40.65~~ **39.3** MMBtu per hour and fired using natural gas, fuel oils No.1, No.2, No.4, No.5, and No.6, process emissions, and hazardous waste. This boiler was constructed in 1964 and exhausts to stack S-29-003.

#### **Specific Comment 3:**

Sections A.2(h)(4) through (11) and D.5(h)(4) through (11):

- (a) These sections should include the capability of burning #5 as stated in the operating permit dated July 8, 1991 for units (4) through (7).
- (b) Units (8) and (9) should be removed because they are no longer at the facility.
- (c) Unit (10) lists the incorrect heat input capacity. The correct heat input capacity is 3.0 MMBtu/hr as listed in the operating permit.
- (d) Unit (11) lists the wrong heat input capacity. The correct heat input capacity is 56.5 MMBtu/hr as of the permit modification issued on November 11, 1998.

#### **Response to Specific Comment 3:**

- (a) Sections A.2(h)(4) through (7) and D.5(h)(4) through (7) have been revised as follows:
- (4) One (1) Born heater (identified as unit BS2740Q) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas, **fuel oil #5**, and/or process emissions. This unit was installed in 1963.
  - (5) One (1) Born heater (identified as unit BT2728S) having a maximum heat input capacity of 6.0 MMBtu per hour and fired using natural gas, **fuel oil #5**, and/or process emissions. This unit was installed in 1964.
  - (6) One (1) BM Furnace (identified as unit BM2724W) having a maximum heat input capacity of 21.38 MMBtu per hour and fired using natural gas, **and fuel oil #5**. This unit was installed in 1969 and exhausts to stack S-27-003.
  - (7) One (1) BD Furnace (identified as unit BD2714V) having a maximum heat input capacity of 15.0 MMBtu per hour and fired using natural gas, **fuel oil #5**, and/or process gas. This unit was installed in 1968 and exhausts to stack S-27-002.
- (a) Section A.2(h)(8) through (9) and D.5(h)(8) through (9) have been revised as follows:
- ~~(8) One (1) Born heater (identified as unit SB2710P) having a maximum heat input capacity of 7.5 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1962.~~
  - ~~(9) One (1) Born heater (identified as unit NB2720Q) having a maximum heat input capacity of 7.5 MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1963.~~
- (b) Sections A.2(h)(10) and D.5(h)(10) have been revised as follows:
- ~~(10)~~ **(8)** One (1) Born heater (identified as unit EP2729Q) having a maximum heat input capacity of ~~43.0~~ **3.0** MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1963.
- (c) Sections A.2(h)(11) and D.5(h)(11) have been revised as follows:
- ~~(11)~~ **(9)** One (1) Born Furnace (identified as unit 732714) having a maximum heat input capacity of ~~36.0~~ **56.5** MMBtu per hour and fired using natural gas and/or process gas. This unit was installed in 1974 and exhausts to stack S-27-005.

#### Specific Comment 4:

Sections A.2(i) and D.6(i): The source requests that the following changes be made to this description:

- (i) Wastewater handling operations, including one (1) Wastewater Treatment Plant, constructed in 1979, having a nominal throughput capacity of 350 gallons of wastewater per minute. The Wastewater Treatment Plant treats wastewater from Plants 27, ~~28~~ **38**, 40, 41, 47, and 48 and offsite wastewater. Plant sewers are pumped to wastewater storage tanks for processing. ~~Depending on the contents of the wastewater, the wastewater may be pH adjusted, clarified, filtered, and/or steam stripped as needed prior to discharge to the POTW. The Wastewater Treatment Plant consists of one (1) large surge volume tank (identified as the North API), four (4) wastewater storage tanks (identified as tanks 15, 16, 17, and 18), one (1) neutralization tank, one (1) clarification/flocculation tank, one (1) plate and frame filter press, and one (1) steam stripper for press filtrate. The plant also has a 78,750 Btu/ft<sup>3</sup> sludge dryer that is not currently in use. The wastewater operations consist of two (2) Group 2 wastewater streams identified as 140 Bottoms and 75 Flow.~~ **The wastewater operations consist of two (2) Group 2 wastewater streams identified as ammonia stripper bottoms and raffinate stripper bottoms.**

#### Response to Specific Comment 4:

Reilly Industries, Inc. has provided no explanation as to why they wish to have this description removed. If the description is incorrect, Reilly Industries, Inc. needs to clarify what specifically is incorrect about the description, and when a change occurred. Deleting this information from the description completely eliminates some emission units with applicable requirements. The requested additional identifications have been added to the description, but nothing has been deleted except references to the sludge dryer for reasons stated in Specific Comment 2. If the information contained in the description is incorrect, Reilly Industries, Inc. may apply for a permit modification, and explain why they wish to make changes. Sections A.2(i) and D.6(i) have been revised as follows:

- (i) Wastewater handling operations, including one (1) Wastewater Treatment Plant, constructed in 1979, having a nominal throughput capacity of 350 gallons of wastewater per minute. The Wastewater Treatment Plant treats wastewater from Plants 27, ~~28~~ **38**, 40, 41, 47, and 48 and offsite wastewater. Plant sewers are pumped to wastewater storage tanks for processing. Depending on the contents of the wastewater, the wastewater may be pH adjusted, clarified, filtered, and/or steam stripped as needed prior to discharge to the POTW. The Wastewater Treatment Plant consists of one (1) large surge volume tank (identified as the North API), four (4) wastewater storage tanks (identified as tanks 15, 16, 17, and 18), one (1) neutralization tank, one (1) clarification/flocculation tank, one (1) plate and frame filter press, and one (1) steam stripper for press filtrate. ~~The plant also has a 78,750 Btu/ft<sup>3</sup> sludge dryer that is not currently in use.~~ The wastewater operations consist of two (2) Group 2 wastewater streams identified as 140 Bottoms (**ammonia stripper bottoms**) and 75 Flow (**raffinate stripper bottoms**).

#### Specific Comment 5:

Sections A.2(j) and D.9(j): The sentence describing the catalyst regenerator should be revised as follows:

- (j) Plant 27 used to manufacture pyridine and picolines. The plant was initially constructed in 1961 and consists of reactors, a product recovery unit, distillation columns, and two (2) cooling towers. A catalyst regenerator (identified as unit BX27REG) is also located in this plant. The catalyst regenerator has ~~a maximum throughput capacity of 10.2 ton of catalyst per hour and~~ emissions of particulate matter **that** are controlled using an **external** cyclone (with same ID as the regenerator), which exhausts to stack S-27-006.

This is requested because the throughput capacity in the description is inaccurate and Reilly Industries, Inc. would like the true capacity to be confidential since divulging the throughput capacity would provide competitive information.

#### Response to Specific Comment 5:

The requested changes have been made to Conditions A.2(j) and D.9(j).

#### Specific Comment 6:

Sections A.2(k) and D.12(k):

- (a) Plant 38 is actually used to manufacture precursors to various grades of vitamin B-3, and its description should be revised accordingly.
- (b) Sections A.2(k)(3) and D.12(k)(3) should be revised as follows:
  - (3) ~~Dryers~~ **An evaporator** with emissions controlled by a ~~baghouse and~~ scrubber;
- (c) Section A.2(k)(4), D.12(k)(4), D.12.8, D.12.9, D.12.10, D.12.11, D.12.12, D.12.13, and D.12.15(a) through (d): The packaging operations are each insignificant emission units associated with the

same process, since they are controlled by dust collectors with exhaust flow rates less than 4,000 acfm and meet a grain loading of less than 0.03 gr/dscf. The following changes are requested to appropriately reflect this process. The description in Section A.2 should be moved to Section A.3 and should be changed as follows:

- (4) One (1) packaging facility consisting of the following:
  - (A) one (1) mill (identified as 28-MB), ~~with a maximum throughput of 2,000 pounds of product per hour. This unit exhausts at stack S-28-010.~~ **with a non-vented pneumatic conveying system,**
  - (B) One (1) **pneumatic conveying system identified as** Vacuum Receiver ~~(identified as 28-VR)~~ **(known as the hurricane blower)**, installed in ~~1996~~ **1997**, with a maximum throughput ~~operating~~ capacity of 6,750 pounds of product per hour. This unit exhausts at stack ~~S-28-004~~ **S-28-002.**
  - (C) **One pick-up collector (known as central vac), installed in 1997, with a maximum operating capacity of 150 pounds per hour. This unit exhausts at stack S-28-003.**

**And controlled by the following two (2) baghouses:**

- (A) **Micro Pul (known as the downstairs collector), installed in 1991, with a maximum operating capacity of 670 pounds per hour, exhausting at stack S-28-004, and**
- (B) **Penthouse collector (known as the MAC dust collector), installed in 2000, with a maximum operating capacity of 1,500 pounds per hour, exhausting at stack S-28-001.**

Furthermore, these units are integral to the production process and therefore not subject to the requirements of a control device. Without these units, Reilly Industries, Inc. would not be able to package the product. Reilly Industries, Inc. requests that conditions D.12.8, D.12.9, D.12.10, D.12.11, D.12.12, D.12.13, and D.12.15(a) and (b) be deleted from the permit, since Reilly Industries, Inc. does not believe that these preventive maintenance, compliance monitoring, record keeping and reporting requirements are appropriate for units that are not control devices.

#### **Response to Specific Comment 6:**

- (a) Sections A.2(k) and D.12(k) have been revised as follows:
  - (k) Plant 38 used to manufacture **precursors to** various grades of vitamins **B-3**. The plant was initially constructed in 1967 and consists of the following emission units:
- (b) Sections A.2(k)(3) and D.12(k)(3) have been revised as requested.
- (c) The unit descriptions have been changed as requested. However, IDEM and OES have not received adequate information to determine that these units are insignificant activities or integral to the process. An emissions unit can not be considered insignificant as a result of complying with an applicable limit, namely 326 IAC 6-1-2(a) in Condition D.12.6. Therefore, these units will continue to be listed under Section A.2, not Section A.3. Conditions D.12.8 and D.12.15(d) will remain because IDEM and OES believe that preventive maintenance plans are necessary for these emission units. Condition D.12.9 will be revised since these operations use dust collectors, rather than baghouses, as particulate control. Conditions D.12.10 and D.12.15(a) will remain in order to ensure compliance with Condition D.12.6. Conditions D.12.11, D.12.12, D.12.13, D.12.15(b), and D.12.15(c) will also remain to ensure compliance with Condition D.12.6.

**Specific Comment 7:** Sections A.2(l)(2) and D.12(l)(2): The exhaust is routed through the boiler, identified as 11-112E, to recover heat. When the boiler is down for maintenance the exhaust is routed through the stack S-41-001. Therefore, Reilly Industries, Inc. requests that these sections be revised as follows:

- (l) Plant 41 used to manufacture pyridine and picoline derivatives and picolines. The plant was initially constructed in 1968. Plant 41 consists of the following facilities:
  - (1) Reactor;
  - (2) Separation facility with emissions controlled using one (1) 8.0 MMBtu per hour waste gas incinerator (identified as unit CP41GCS), which exhausts to stack S-41-001 or S-29-001;
  - (3) Distillation.

**Response to Specific Comment 7:** The requested changes have been made to Sections A.2(l)(2) and D.12(l)(2).

**Specific Comment 8:** Sections A.2(m) and D.12(m): These sections should be removed. There is only one packaging unit at Plant 38 and it is described in Section A.2(k).

**Response to Specific Comment 8:** The sections have been removed as follows and the remainder of equipment has been re-lettered accordingly:

~~(m) — One (1) Niacinamide Packaging Unit that includes:~~

- ~~(1) — one (1) Mill Bag House (constructed 1992), with a maximum throughput capacity of 2,000 pounds per hour;~~
- ~~(2) — one (1) Vacuum Receiver (construction 1996), with a maximum capacity of 6,750 pounds per hour; and~~
- ~~(3) — one (1) Pick-up Bag House (constructed in 1981) with a maximum capacity of 150 pounds per hour.~~

**Specific Comment 9:** Sections A.2(n) and D.10(n)

- (a) Plant 40 is used to dehydrate both 2-picoline and 4-picoline. The description should be revised to reflect this.
- (b) The still atmospheric vents exhausts through S/V 40-002C not S/v 40-003. Sections A.2(n)(3) and D.10(n)(3) should be revised accordingly.
- (c) The vent tank is used to vent emissions from columns 1, 2, and 4 rather than the vent tank. Sections A.2(n)(4) and D.10(n)(4) should be revised accordingly.

**Response to Specific Comment 9:**

(a),(b),(c): Sections A.2(n) and D.10(n) have been revised as requested:

- (n) Plant 40 is used to dehydrate 2-picolinic acid ~~or~~ and 4-picolinic acid with caustic to produce vinyl pyridine. The plant was initially constructed in 1969. Plant 40 consists of the following process units: reactor, separation, distillation, and vent tank. Emissions are vented through six vents identified as follows:
  - (1) Column #3 Atmospheric Vent (S/V 40/001) used to vent emissions from the separation facilities;

- (2) Receiver Atmospheric Vents (S/V 40-002A, 40-002B, and 40-002C) used to vent emissions from the distillation facilities;
- (3) Still Atmospheric Vent (S/V 40-003**2C**) used to vent emissions from the distillation facilities; and
- (4) Vent tank (S/V 40-004) used to vent emissions from ~~the vent tank~~ **Columns 1, 2, and 4.**

**Specific Comment 10:** Sections A.2(o) and D.11:

- (a) The drying facility listed as (o)(4) is actually part of Plant 27 and should be moved to the proper section of the permit. Conditions D.11.2, D.11.3, D.11.4, D.11.6, D.11.7, D.11.8, and D.11.9 should be deleted. There are scrubbers located at Plant 47 but the scrubber described in this section is located at Plant 27 and this emission unit has potential emissions (without controls) of less than 25 tons per year. This unit is therefore not subject to 326 IAC 8-1-6 (BACT), and should not be subject to a specific emission limitation or any associated compliance monitoring, recordkeeping or reporting requirements. It is possible the numbers listed in the operating permit were based on calculations of actual emissions that established an allowable for fee purposes, including the scrubber's hours of operation that are associated only with the regeneration phase. The scrubber is there to remove the small amount of organic material that may remain on the molecular sieves, when nitrogen is first introduced to the unit. This is a result of the water saturation process, because nitrogen is blown through the molecular sieves to remove the water on the sieves. The only time emission are coming off of the molecular sieves into the scrubber is when the molecular sieves are being regenerated. While operating the drying unit, there are no emissions going to the scrubber. The material is passed through the drying unit to remove water out of the product. The scrubber is integral to the regeneration process and if it is to be considered a control device it equates to a voluntary odor control device. Further, this is a water scrubbing process or flushing process and a pH meter is not a reasonable monitoring device. Also, the drying facility is not associated with the scrubbing process. Reilly Industries, Inc. requests that the requirement be dropped. Condition D.11.3, Preventive Maintenance Plan, should be removed because the emission units each have actual uncontrolled emissions of less than 25 tons per year, and potential emissions of less than ten pounds per hour. No NESHAPs or NSPSs apply to these facilities, and no limits have been taken to avoid applicable standards.
- (b) Sections A.2(o)(5) and D.11(o)(5) describe a 0.4 MMBtu/hr waste gas incinerator (HC47GFS). Prior to this permit, all previous permits have described this unit as a waste gas flare. Reilly Industries, Inc. concurs with the description in the current operating permit for this unit as being a waste gas flare and not a waste gas incinerator.
- (c) Sections A.2(o)(6) and (7) and D.11(o)(6) and (7) are process heaters and should be listed with the other process heaters.

**Response to Specific Comment 10:**

Section A.2(o) and D.11 have been modified as follows in response to Comments (a),(b), and (c):

- (o) Plant 47, used to manufacture a variety of specialty chemicals. The plant was initially constructed in 1979 and consists of the following facilities:
  - (1) Reactor, **controlled by a scrubber**
  - (2) Distillation
  - (3) Separation
  - (4) ~~Drying facility with emissions controlled by a scrubber~~

- ~~(5)~~**(4)** One (1) 0.4 MMBtu per hour waste gas incinerator flare (identified as unit HC47GFS), used to control emissions from Plant 47. This unit was installed in 1979 and exhausts to stack S-47-001.
- ~~(6)~~ One (1) CS Kettle equipped with a 5 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.
- ~~(7)~~ One (1) CS Still equipped with an 8.48 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.

In regards to comment (a), Reilly Industries, Inc. has not provided sufficient information to determine uncontrolled potential emission rates. In the Title V application, Reilly Industries, Inc. referred to the "White Paper" and exercised their right to refrain from providing emissions information. In the absence of emissions information, IDEM and OES assume that all rules are applicable based on previous permit decision, unless emission limits are met. Installation Permit, 900049-01, issued on March 26, 1990, established these emissions limits to avoid PSD and BACT applicability. Because a limit has been established to avoid PSD and BACT applicability and a control device is necessary to meet that limit, compliance monitoring requirements are necessary. Secondly, IDEM and OES do not find this request to be ample justification in considering the scrubber integral to the process. If the scrubber could be considered "voluntary odor control" it does not seem that it is integral to the process since the process could presumably continue with the presence of odor. Therefore, the emission limitation, and associated compliance monitoring, recordkeeping and reporting requirements will remain in the permit. However, since the molecular sieves regenerator is actually the VOC emitting unit controlled by the scrubber, and is actually located at Plant 27, the requirements will be revised accordingly. Furthermore, after reviewing the existing operating permit, it is clear that the emissions limitations established in Condition D.11.2 were intended for the molecular sieves regenerator, rather than the drying facility. In order to demonstrate compliance through parametric monitoring a stack testing requirement has been added to determine the normal flow rate for the scrubber controlling the molecular sieves regenerator. The Sections D.9(j) and A.2(j) have been revised as follows (changes from Specific Comment 5 also incorporated):

- (j) Plant 27 used to manufacture pyridine and picolines. The plant was initially constructed in 1961 and consists of reactors, a product recovery unit, distillation columns, **a drying facility**, and two (2) cooling towers. A catalyst regenerator (identified as unit BX27REG), **constructed in 1990**, is also located in this plant. The catalyst regenerator has a maximum throughput capacity of 10.2 ton of catalyst per hour and emissions of particulate matter **that** are controlled using **an external cyclone** (with same ID as the regenerator) which exhausts to stack S-27-006. **A molecular sieves regenerator, constructed in 1990, with VOC emissions controlled by a scrubber, is also located at this plant.**

Pursuant to 326 IAC 1-2-34, an incinerator is "An engineered apparatus that burns waste substances with controls on combustion factors, including, but not limited to, temperature, retention time, and air." Pursuant to 326 IAC 1-2-29, a flare is "an elevated combustion device that burns waste gases." Because the unit in question does burn waste gases rather than solid materials, IDEM, OAQ, and OES agree that the unit meets the definition of a flare, and is not subject to the requirements of 326 IAC 4-2. Condition D.11.1 has been removed as a result of this comment. Also as a result of this comment, Condition D.11.5, which was included to demonstrate compliance with Condition D.11.1, has been removed. Conditions D.11.2 D.11.4, D.11.6, D.11.7, D.11.8, D.11.9(a)(b)(d) have been moved to Section D.9 as follows:

#### ~~Emission Limitations and Standards [326 IAC 2-7-5(1)]~~

##### ~~D.11.1 Incinerator Requirements [326 IAC 4-2]~~

~~Pursuant to 326 IAC 4-2, the incinerator shall:~~

- ~~(1) Consist of primary and secondary chambers or the equivalent;~~
- ~~(2) Be equipped with a primary burner unless burning wood products;~~

- ~~(3) Comply with 326 IAC 5-1 and 326 IAC 2;~~
- ~~(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-26; and~~
- ~~(5) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air.~~
- ~~(6) If any of the requirements of (d)(1) through (d)(5) above are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.~~

~~The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.~~

**D.11.2 D.9.19 VOC Emission Limitation [326 IAC 8-1-6][326 IAC 2-2][OP 900049-01]**

The ~~drying facility~~ **molecular sieves regenerator** shall comply with the following limitations:

- (a) The emissions of VOC from the ~~drying facility~~ **molecular sieves regenerator** stack exhaust shall not exceed 0.063 pounds per hour and 0.04 tons per twelve-month period.
- (b) The scrubber used to control emissions from the ~~drying facility~~ **molecular sieves regenerator** shall be in operation at all times the drying facility is in operation.
- (c) The number of hours of operation for the ~~drying facility~~ **molecular sieves regenerator** shall not exceed 1,350 hours per twelve consecutive month period.

Compliance with these limits make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 not applicable.

~~D.11.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.~~

**D.9.22 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

**Within 180 days after issuance of this Part 70 permit, in order to demonstrate compliance with D.9.19, the Permittee shall perform VOC testing on the molecular sieves regenerator utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.**

**D.9.24 D.9.23 Monitoring Requirements: Process Vent Provisions [326 IAC 20] [40 CFR 63, Subpart G]**

- (a) . . .
- (b) Pursuant to 40 CFR 63.114(d), the Permittee shall comply with Conditions ~~D.9.24~~ **D.9.23** (b)(1) or (b)(2) for any bypass line between the origin of the gas stream (i.e., at an air oxidation reactor, distillation unit, or reactor) and the point where the gas stream reaches the process vent that could divert the gas stream directly to the atmosphere. Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to condition.
- (1) Properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. Records shall be generated as specified in Condition ~~D.9.30(a)~~ **D.9.36(a)**. The flow indicator shall be installed at the entrance to any bypass line that could divert the gas stream to the atmosphere;  
or

. . .

~~D.9.22~~ **D.9.24** Test Methods and Procedures Equipment Leaks [326 IAC 14][40 CFR 63 Subpart H]

Pursuant 40 CFR 63.180(a), the Permittee shall comply with the following test methods and procedures:

- (a) . . .
- (b) . . .
- (c) . . .
- (d) The Permittee may use good engineering judgment rather than the procedures in Condition ~~D.9.22~~ **D.9.24** (c) to determine that the percent organic HAP content does not exceed 5 percent by weight. When the Permittee and IDEM, OAQ do not agree on whether a piece of equipment is not in organic HAP service, however, the procedures in paragraph (c) shall be used to resolve the disagreement. Conversely, the Permittee may determine that the organic HAP content of the process fluid does not exceed 5 percent by weight by, for example, accounting for 98 percent of the content and showing that organic HAP is less than 3 percent.
- (e) If the Permittee determines that a piece of equipment is in organic HAP service, the determination can be revised after following the procedures in Condition ~~D.9.22~~ **D.9.24** (c), or by documenting that a change in the process or raw materials no longer causes the equipment to be in organic HAP service.
- (f) Samples used in determining the percent organic HAP content shall be representative of the process fluid that is contained in or contacts the equipment.

. . .

**Compliance Determination Requirements**

~~D.11.4~~ **D.9.25** VOC Control

In order to comply with ~~D.11.2~~ **D.9.19**, the scrubber shall be in operation and control emissions from the dryer at all times that the dryer is in operation. A pH meter shall be calibrated, maintained, and operated for the drying facility scrubbers.

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

~~D.11.5~~ Visible Emissions Notations

- (a) ~~Visible emission notations of the incinerator stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) ~~For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut-down time.~~
- (c) ~~In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- (d) ~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.~~

~~D.11.6~~ **D.9.29** Monitoring Requirements for the Scrubber

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The Permittee shall monitor the scrubber ~~recirculation flow rate and pH~~ at least once per shift for the scrubber controlling the emissions from the ~~drying facility~~ **molecular sieves regenerator**. When for any one reading the flow rate is outside the normal range **established from the stack test required by Condition D.9.22** ~~or the pH is outside the normal range~~, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. The Compliance Response Plan for the scrubbers shall contain troubleshooting contingency and corrective actions for when the flow rate ~~or pH~~ reading is outside of the normal range for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

~~D.11.7~~ **D.9.30** Scrubber Inspections

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An inspection shall be performed each calendar quarter of the scrubber controlling the ~~drying facilities~~ **molecular sieves regenerator**.

~~D.11.8~~ **D.9.31** Failure Detection

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In the event that a scrubber malfunction has been observed, the failed scrubber and the associated processes shall be shut down immediately until the scrubber has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

~~D.11.9~~ Record Keeping Requirements

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- ~~(a) To document compliance with Condition D.11.6, the Permittee shall maintain records of the flow rate for the scrubber once per shift during normal operation.~~
- ~~(b) To document compliance with Condition D.11.7, the Permittee shall maintain records of the results of the inspections required under Condition D.11.7.~~
- ~~(c) To document compliance with Condition D.11.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(d) To document compliance with Condition D.11.2, the Permittee shall maintain records of the hours of operation of the drying facility once per shift.~~
- ~~(e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

~~D.9.27~~ **D.9.32** Record Keeping Requirements

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- (a) To document compliance with Condition ~~D.9.23~~ **D.9.26**, the Permittee shall maintain records of visible emission notations of the Catalyst Regenerator stack exhaust once per shift.
- (b) To document compliance with Condition ~~D.9.24~~ **D.9.27**, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.
- (c) To document compliance with Condition ~~D.9.25~~ **D.9.28 and D.9.31**, the Permittee shall maintain records of the results of the inspections required under Condition ~~D.9.25~~ **D.9.28 and D.9.31**.
- (d) To document compliance with Condition ~~D.9.19~~ **D.9.20**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

- (e) **To document compliance with Condition D.9.19, the Permittee shall maintain records of the hours of operation of the drying facility once per shift.**
- (f) **To document compliance with Condition D.9.30, the Permittee shall maintain records of the flow rate for the scrubber once per shift during normal operation.**
- ~~(e)~~(g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

...

~~D.9.34~~ **D.9.39** Reporting requirements for Equipment Leaks [326 IAC 14][40 CFR 63 Subpart H]

- (a) Pursuant to 40 CFR 63.182(d), the Permittee shall submit Periodic Reports.
  - (1) A report containing the information in Conditions ~~D.9.34~~ **D.9.40**(a)(2), (a)(3), and (a)(4) shall be submitted semiannually as required in 40 CFR 63.182(c).

Sections A.2(h) and D.5(h) have been revised as follows as a result of Comment (c):

- (h) Eleven (11) process heaters, including:

- ...
- (10) One (1) CS Kettle equipped with a 5 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.**
- (11) One (1) CS Still equipped with an 8.48 MMBtu per hour Born heater, which is fired using natural gas. This unit is located in Plant 47 and was constructed in 1979.**

After incorporating all the changes resulting from this comment, no Conditions remain in Section D.11. Therefore, in place of permit conditions, the following statement has been added:

**There are no requirements applicable to these units.**

**Specific Comment 11:**

Sections A.3(a)(1) and (2) and D.5(a)(1) and (2): The two process heaters listed in these sections are no longer used and are not capable of being used at this time. Reilly Industries, Inc. requests that these units be removed from the permit. Reilly Industries, Inc. also requests that units SB2710P and NB2720Q be removed since they are no longer at the facility.

**Response to Specific Comment 11:**

Sections A.2(h) (8) and (9) and D.5(h) (8) and (9) have been modified as follows:

- ~~(8) One (1) Born heater (identified as unit SB2710P) having a maximum heat input capacity of 7.5 MMBtu per hour and fired using natural gas and/or process gas.~~
- ~~(9) One (1) Born heater (identified as unit NB2720Q) having a maximum heat input capacity of 7.5 MMBtu per hour and fired using natural gas and/or process gas.~~

Sections A.3(a)(1) and (2) and D.5(a)(1) and (2) have been modified as follows:

- ~~(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:~~
  - ~~(1) One (1) Born heater (identified as unit FC2607T) having a maximum heat input capacity of 3.6 MMBtu per hour and fired using natural gas.~~
  - ~~(2) One (1) Alcorn heater (identified as unit AL2713W) having a maximum heat input capacity of 9.8 MMBtu per hour and fired using natural gas.~~

Sections D.5.1, D.5.2, D.5.5, D.5.6, and D.5.7 have also been revised as a result of this comment:

**D.5.1 Particulate Matter Limitation (PM) [326 IAC 6-1-12]**

- (a) Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations), the particulate matter emissions from the heaters shall be limited as follows:

Heater	PM Limitation	
	in Tons per year	in lbs per MMBtu
722804	Shall burn only natural gas	
BX2707V	0.4	0.011
BXS2706Q	0.1	0.011
BS2740Q	2.0	0.15
BT2728S	2.2	0.15
BM2724W	Shall burn only natural gas	
BD2714V	3.1	0.15
EP2729Q	0.1	0.011
732714	7.5	0.15
FC2607F	Shall burn only natural gas	
AL2713W	Shall burn only natural gas	

**D.5.2 Sulfur Dioxide Emission Limitations (SO<sub>2</sub>) [326 IAC 7-2]**

- (a) Pursuant to 326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations), emissions of sulfur dioxide from the heaters shall not exceed the emission rates provided in the following table:

Heaters	SO <sub>2</sub> Emission Limitations	
	lbs per MMBtu	lbs per hour
722804	Less than 0.05	Less than 0.05
BX2707V	1.25	20.0
BXS2706Q	Less than 0.05	Less than 0.05
BS2740Q	1.25	7.5
BT2728S	1.25	7.5
BM2724W	1.25	26.3
BD2714V	1.25	18.8
SB2710P	Less than 0.05	Less than 0.05
EP2729Q	1.25	3.8
732714	1.25	45.0
FC2607F	Less than 0.05	Less than 0.05
AL2713W	Less than 0.05	Less than 0.05

- (b) Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

**D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the heaters 722804, BX2707V, BX2706Q, BS2740Q, BT2728S, BM2724W, BD2714V, ~~SB2710P, NB2720Q~~, EP2729Q, and 732714.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.5.6 Visible Emissions Notations**

- (a) Visible emission notations of heaters 722804, BX2707V, BX2706Q, BS2740Q, BT2728S, BM2724W, BD2714V, ~~SB2710P, NB2720Q~~, EP2729Q, and 732714 stack exhausts shall be performed once per shift during normal daylight operations when burning process gas. A trained employee shall record whether emissions are normal or abnormal.

...

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.5.7 Record Keeping Requirements**

- (a) To document compliance with Condition D.5.6, the Permittee shall maintain records of visible emission notations of process heaters 722804, BX2707V, BX2706Q, BS2740Q, BT2728S, BM2724W, BD2714V, ~~SB2710P~~, ~~NB2720Q~~, EP2729Q, and 732714 stack exhausts once per shift.
- (b) To document compliance with Condition ~~D.5.7~~ **D.5.5**, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

**Specific Comment 12:**

Section A.3(b) and D.8(b): The storage capacity of tank 254 is 19,735 gallons.

**Response to Specific Comment 12:**

Sections A.3(b) and D.8(b) have been revised as follows:

- (b) One (1) storage tank (identified as T-254) having a maximum storage capacity of ~~19,275~~ **19,753** gallons and used to store benzene. This storage tank was constructed May 1990.

**Specific Comment 13:**

Sections A.3(c) and D.9(d): Reilly Industries, Inc. wishes to remove all the tanks listed in the table for storing benzene except 212 at Plant 27, 211 and 213 at Plant 41, each with a capacity of 6,101 gallons and 236 at Plant 41 with a capacity of 32,005 gallons. Reilly Industries, Inc. will no longer be using these tanks for storing benzene.

**Response to Specific Comment 13:**

Tanks removed from the table of benzene storage tanks have been listed as insignificant activities because they are insignificant storage tanks with VOC emissions less than 3 pounds per hour or 15 pounds per day; single HAP emissions less than 5 pounds per day or 1 ton per year; and combined HAP emissions less than 12.5 pounds per day or 2.5 tons per year. Sections A.3(c) and D.9(d) along with A.3 (cc) have been revised as follows:

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
Plant 26	2600	2,961	1974
	2600Z	2,961	1974
	2601	2,961	1974
	2602	2,961	1974
	2604A	3,948	1983
	2605A	1,763	1980
	2606A	1,763	1980
	2607	1,316	1980
	2608	1,316	1980
	2609A	2,133	1980
	2610	2,133	1980
	26101A	2,133	1980
	26102C	2,133	1980
	26103A	2,133	1980
	26104A	2,133	1980
	2611A	2,133	1982
	2612A	2,133	1982
	2613	2,133	1978
	2614	2,133	1978
	2615	2,133	1980
2616	2,133	1980	
2617	2,133	1980	
2618A	6,792	1980	

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
	26199	846	1980
	2619A	564	1980
	2620A	2,538	1980
	2621A	2,538	1980
	2622A	2,538	1980
	2623A	6,792	1980
	2624	6,792	1980
	2625	6,792	1980
	26266A	2,138	1980
	2626B	2,138	1980
	2628	3,305	1980
	26299	846	1980
	2630A	2,961	1974
	2631A	2,961	1974
	2632A	2,961	1974
	2633	2,961	1974
	2634A	2,961	1974
	2635A	2,961	1974
	2636	2,961	1974
	2637	6,792	1974
	2638	7,614	1974
	2639	7,614	1974
	2640	7,614	1974
	2641A	4,888	1980
	2642A	4,888	1980
	2643A	4,888	1980
	2644	7,614	1974
	2646	3,760	1980
	2649	9,400	1995
	2693A	881	1980
	2694	1,269	NA
	2696	1,469	1980
	2697	1,469	1980
	2698A	1,469	1980
<b>Plant 27</b>	212	6,169 6,101	1980
	233	7,638	1980
	234	7,638	1980
	257	2,979	1980
	271	8,813	1980
	272	8,813	1980
	273	8,813	1980
	299	5,264	1980
	457	4,888	1993
	458	4,888	1993
	600	6,169	1973
	699	5,264	1973
<b>Plant 38</b>	501	5,200	1981
	502	5,200	1981
	506	5,200	1980
	507	5,200	1980
	508	5,200	1981
	509	5,200	1981
	516	5,200	1970
	517	5,200	1980
	518	5,200	1970
	519	5,200	1980
<b>Plant 40</b>	300	2,221	1980
	301	2,221	1980
	302	6,169	1995
	303	6,169	1984
	304	6,169	1984
	311A & C	2,056	1980
	311B	1,542	1980
	312	6,169	1980

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
	313	6,169	1980
	314	6,169	1980
	362	2,133	NA
	368	5,875	1989
	370	2,327	NA
	371	4,512	1980
	399	6,169	NA
	Plant 41	21	5,585
	23	2,735	NA
	24	2,735	NA
	25	2,003	NA
	26	2,009	1980
	38	5,949	1980
	43	6,169	1980
	44	6,169	1980
	45	6,169	1980
	46	6,169	1980
	47	6,169	1980
	48	6,169	1980
	56	9,988	NA
	57	8,065	1980
	211	6,169 6,101	1980
	213	6,169 6,101	1980
	214	6,169	1980
	236	7,820	1980
	298	1,269	1980
	299	5,264	NA
Plant 47	514	2,115	1980
	710	4,402	1981
	711	4,402	1981
	712	7,638	1980
	714	7,826	1981
	750	3,455	1979
	751	3,455	1979
	752	3,455	1979
	753	3,455	1979
	754	3,455	1979
	755	3,455	1979
	756	3,455	1979
	757	3,455	1979
	758	3,455	1979
	759	3,455	1979
	760	3,455	1979
	761	3,455	1979
	762	3,455	1979
	763	3,455	1979
	764	3,455	1979
	766	6,363	1979
	770	6,363	1979
	771	6,363	1979
	772	8,531	1991
	780	6,363	NA
	781	6,363	1991
	785	3,455	1979
Plant 48	405	5,182	1972
	406	5,182	1972
	540	6,463	1988
	541	6,463	1988
	542	6,463	1972
	543	6,463	1972
	545	6,463	1972
	546	6,463	1972
	547	6,463	1972
	548	6,463	1988

Tank Location	Tank ID	Storage Capacity (gallons)	Year Installed
	550	6,463	1972
	551	6,463	1972
	552	6,463	1972
	553	6,463	1972
	556	6,463	1980
	557	6,463	1980
	558	9,342	1980
	599	1,904	1980
	Wastewater Treatment Plant (Plant 49)	4923	3,995
4929		8,813	1994
416		1,692	1994

NA — Construction date unknown.

...

(cc)

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
Plant 26	2600	2,961	1974
	2603	NA	1983
	26007	2,961	1974
	2601	2,961	1974
	2602	2,961	1974
	2604A	3,948	1983
	2605A	1,763	1980
	2606A	1,763	1980
	2607	1,316	1980
	2608	1,316	1980
	2609A	2,133	1980
	2610	2,133	1980
	26101A	2,133	1980
	26102C	2,133	1980
	26103A	2,133	1980
	26104A	2,133	1980
	2611A	2,133	1982
	2612A	2,133	1982
	2613	2,133	1978
	2614	2,133	1978
	2615	2,133	1980
	2616	2,133	1980
	2617	2,133	1980
	2618A	6,792	1980
	26199	846	1980
	2619A	564	1980
	2620A	2,538	1980
	2621A	2,538	1980
	2622A	2,538	1980
	2623A	6,792	1980
	2624	6,792	1980
	2625	6,792	1980
	26266A	2,138	1980
	2626B	2,138	1980
	2628	3,305	1980
	26299	846	1980
	2630A	2,961	1974
	2631A	2,961	1974
	2632A	2,961	1974
	2633	2,961	1974
2634A	2,961	1974	
2635A	2,961	1974	
2636	2,961	1974	
2637	6,792	1974	

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	<b>2638</b>	<b>7,614</b>	<b>1974</b>
	<b>2639</b>	<b>7,614</b>	<b>1974</b>
	<b>2640</b>	<b>7,614</b>	<b>1974</b>
	<b>2641A</b>	<b>4,888</b>	<b>1980</b>
	<b>2642A</b>	<b>4,888</b>	<b>1980</b>
	<b>2643A</b>	<b>4,888</b>	<b>1980</b>
	<b>2644</b>	<b>7,614</b>	<b>1974</b>
	2645A	10,188	1974
	2648	10,152	1995
	<b>2646</b>	<b>3,760</b>	<b>1980</b>
	<b>2649</b>	<b>9,400</b>	<b>1995</b>
	<b>2693A</b>	<b>881</b>	<b>1980</b>
	<b>2694</b>	<b>1,269</b>	<b>NA</b>
	<b>2696</b>	<b>1,469</b>	<b>1980</b>
	<b>2697</b>	<b>1,469</b>	<b>1980</b>
	<b>2698A</b>	<b>1,469</b>	<b>1980</b>
Plant 27	60	259,095	1980
	61	259,095	1980
	62	259,095	1980
	63	259,095	1980
	67	259,095	1980
	70	259,095	1980
	71	259,095	1980
	72	259,095	1980
	73	259,095	1980
	101	51,702	1961
	102	51,702	1980
	103	51,702	1980
	105	102,369	1963
	106	132,192	1980
	107	132,192	1980
	108	132,192	1980
	109	132,192	1980
	110	132,192	1980
	112	51,702	1980
	113	51,702	1980
	116	51,702	1980
	117	51,702	1980
	200	51,702	1980
	201	51,702	1980
	202	51,702	1980
	203	51,702	1980
	204	51,702	1980
	205	51,702	1980
	206	51,702	1980
	207	51,702	1961
	208	19,858	1962
	209	19,858	1980
	210	19,858	1980
	<b>233</b>	<b>7,638</b>	<b>1980</b>
	<b>234</b>	<b>7,638</b>	<b>1980</b>
	240	19,858	1980
	241	19,858	1980
	242	19,858	1980
	243	19,858	1980
	244	19,858	1980
	250	19,858	1980
	251	19,858	1980
	252	19,858	1980
	253	19,858	1980
	254	19,858	1980
	<b>257</b>	<b>2,979</b>	<b>1980</b>
	270	25,381	1980
	<b>271</b>	<b>8,813</b>	<b>1980</b>

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	<b>272</b>	<b>8,813</b>	<b>1980</b>
	<b>273</b>	<b>8,813</b>	<b>1980</b>
	274	28,287	1980
	<b>299</b>	<b>5,264</b>	<b>1980</b>
	411	19,858	1980
	412	19,858	1980
	413	19,858	1980
	414	19,858	1980
	415	19,858	1980
	421	19,858	1980
	422	19,858	1980
	423	19,858	1980
	424	19,858	1980
	425	19,858	1980
	431	19,858	1980
	432	19,858	1980
	433	19,858	1980
	434	19,858	1980
	435	19,858	1980
	441	19,858	1980
	442	19,858	1980
	443	19,858	1980
	444	19,858	1980
	445	19,858	1980
	451	19,858	1980
	452	19,858	1980
	453	19,858	1980
	454	19,858	1980
	455	19,858	1980
	<b>457</b>	<b>4,888</b>	<b>1993</b>
	<b>458</b>	<b>4,888</b>	<b>1993</b>
	528	13,154	1980
	529	13,154	1980
	<b>600</b>	<b>6,169</b>	<b>1973</b>
	601	20,728	1973
	602	20,728	1973
	603	20,728	1973
	604	20,728	1973
	605	20,728	1973
	606	20,728	1973
	607	29,940	1973
	608	29,940	1973
	609	50,668	1996
	610	27,637	1995
	611	29,940	1971
	612	29,940	1973
	620	29,940	1969
	621	29,940	1980
	622	29,940	1980
	630	29,940	1980
	631	29,940	1980
	632	29,940	1980
	640	98,703	1980
	641	98,703	1980
	650	30,063	1980
	651	30,063	1980
	<b>699</b>	<b>5,264</b>	<b>1973</b>
Plant 29	2938	44,945	1980
	2939	44,945	1980
	2969	85,308	1996
	2964	259,095	1980
	2965	259,095	1980
	2966	259,095	1980
	2938	44,945	1980

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	2939	44,945	1980
	2964	259,095	1980
	2965	259,095	1980
	2966	259,095	1980
Plant 38	<b>501</b>	<b>5,200</b>	<b>1981</b>
	<b>502</b>	<b>5,200</b>	<b>1981</b>
	<b>506</b>	<b>5,200</b>	<b>1980</b>
	<b>507</b>	<b>5,200</b>	<b>1980</b>
	<b>508</b>	<b>5,200</b>	<b>1981</b>
	<b>509</b>	<b>5,200</b>	<b>1981</b>
	<b>516</b>	<b>5,200</b>	<b>1970</b>
	<b>517</b>	<b>5,200</b>	<b>1980</b>
	<b>518</b>	<b>5,200</b>	<b>1970</b>
	<b>519</b>	<b>5,200</b>	<b>1980</b>
	521	11,750	1980
	522	11,750	1980
	523	11,750	1980
	524	20,305	1987
	525	20,305	1987
	526	11,750	1965
Plant 40	321	21,997	1980
	322	21,997	1980
	323	21,997	1980
	324	29,940	1980
	331	21,997	1980
	332	21,997	1980
	333	29,940	1980
	334	29,940	1980
	335	21,997	1997
	341	21,997	1980
	342	21,997	1980
	343	21,997	1980
	344	21,997	1980
	350	21,997	1980
	351	21,997	1980
	352	21,997	1980
	353	21,997	1980
	354	11,750	1980
	355	11,750	1980
	356	11,750	1980
	357	11,750	1980
	358	11,750	1980
	361	11,750	1980
	363	11,750	1980
Plant 41	1	15,274	1980
	2	15,274	1980
	3	15,274	1980
	4	15,274	1980
	5	15,274	1980
	6	15,274	1980
	7	15,170	1980
	8	15,170	1980
	9	15,274	1980
	10	13,227	1980
	12	15,274	1980
	13	15,274	1980
	14	15,274	1980
	15	15,274	1980
	16	15,274	1980
	17	15,274	1980
	18	15,274	1980
	19	15,274	1980
	<b>21</b>	<b>5,585</b>	<b>1980</b>
	<b>23</b>	<b>2,735</b>	<b>NA</b>

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	<b>24</b>	<b>2,735</b>	<b>NA</b>
	<b>25</b>	<b>2,003</b>	<b>NA</b>
	<b>26</b>	<b>2,009</b>	<b>1980</b>
	30	15,274	1989
	31	15,274	1980
	32	15,274	1980
	34	15,274	1980
	36	15,274	1980
	<b>38</b>	<b>5,949</b>	<b>1980</b>
	40	16,351	1980
	<b>43</b>	<b>6,169</b>	<b>1980</b>
	<b>44</b>	<b>6,169</b>	<b>1980</b>
	<b>45</b>	<b>6,169</b>	<b>1980</b>
	<b>46</b>	<b>6,169</b>	<b>1980</b>
	<b>47</b>	<b>6,169</b>	<b>1980</b>
	<b>48</b>	<b>6,169</b>	<b>1980</b>
	<b>56</b>	<b>9,988</b>	<b>NA</b>
	<b>57</b>	<b>8,065</b>	<b>1980</b>
	<b>214</b>	<b>6,169</b>	<b>1980</b>
	215	19,858	1980
	216	19,858	1980
	217	19,858	1980
	218	19,858	1980
	219	19,858	1980
	220	19,858	1980
	221	19,858	1980
	222	19,858	1980
	223	19,858	1980
	224	19,858	1980
	225	19,858	1996
	226	19,858	1962
	227	19,858	1980
	228	19,858	1980
	229	19,858	1980
	230	19,858	1980
	232	20,851	1980
	<b>236</b>	<b>7,820</b>	<b>1980</b>
	<b>298</b>	<b>1,269</b>	<b>1980</b>
	<b>299</b>	<b>5,264</b>	<b>NA</b>
Plant 47	<b>514</b>	<b>2,115</b>	<b>1980</b>
	700	10,152	1981
	701	10,152	1981
	702	10,152	1980
	<b>710</b>	<b>4,402</b>	<b>1981</b>
	<b>711</b>	<b>4,402</b>	<b>1981</b>
	<b>712</b>	<b>7,638</b>	<b>1980</b>
	<b>714</b>	<b>7,826</b>	<b>1981</b>
	716	11,844	1980
	717	10,152	1981
	718	10,152	1981
	719	10,152	1981
	720	10,152	1981
	721	10,152	1981
	722	10,152	1981
	726	10,152	1981
	727	10,152	1981
	728	10,152	1981
	<b>750</b>	<b>3,455</b>	<b>1979</b>
	<b>751</b>	<b>3,455</b>	<b>1979</b>
	<b>752</b>	<b>3,455</b>	<b>1979</b>
	<b>753</b>	<b>3,455</b>	<b>1979</b>
	<b>754</b>	<b>3,455</b>	<b>1979</b>
	<b>755</b>	<b>3,455</b>	<b>1979</b>
	<b>756</b>	<b>3,455</b>	<b>1979</b>

Plant Location	Tank ID	Storage Capacity (gallons)	Construction Date
	757	3,455	1979
	758	3,455	1979
	759	3,455	1979
	760	3,455	1979
	761	3,455	1979
	762	3,455	1979
	763	3,455	1979
	764	3,455	1979
	766	6,363	1979
	770	6,363	1979
	771	6,363	1979
	772	8,531	1991
	774	10,152	1980
	775	21,151	1999
	776	21,151	1999
	777	10,152	1979
	778	10,152	1979
	779	10,152	1979
	790	13,513	Prior to 1984
	791	13,513	1980
	792	13,513	1980
	793	13,513	1980
	794	13,513	1973
	795	13,513	1980
	797	20,305	1998
	780	6,363	NA
	781	6,363	1991
	785	3,455	1979
	798	10,152	1997
	799	14,806	1980
Plant 48	401	14,394	NA
	405	5,182	1972
	406	5,182	1972
	530	11,750	1972
	531	11,750	1972
	532	11,750	1972
	535	11,750	1972
	540	6,463	1988
	541	6,463	1988
	542	6,463	1972
	543	6,463	1972
	545	6,463	1972
	546	6,463	1972
	547	6,463	1972
	548	6,463	1988
	550	6,463	1972
	551	6,463	1972
	552	6,463	1972
	553	6,463	1972
	556	6,463	1980
	557	6,463	1980
	558	9,342	1980
	599	1,904	1980
Wastewater Treatment Plant (Plant 49)	4915	82,911	1980
	4916	82,911	1980
	4917	476,595	1980
	4918	476,595	1980
	4919	19,858	1980
	4921	16,921	1980

NA – No data available.

Also, as result of this comment, Sections A.3(a) and D.8(a) (previously deleted in Specific Comment Response 11) have been replaced with the description of Tank 236 at Plant 41 as follows:

- (a) **One (1) storage tank, identified as 236, located at Plant 41, having a maximum storage capacity of 32,005 gallons and used to store benzene. This storage tank was constructed 1980.**

Tank 236, with a maximum storage capacity of 32,005 gallons, used to store benzene is not subject to 40 CFR, Subpart Kb, because it was constructed prior to July 23, 1984. Tank 236 is not subject to 40 CFR, Subpart Ka, because it has a storage capacity of less than 40,000 gallons. The applicability of state and federal rules presented in the Technical Support Document is based on the information provided in the Part 70 application and contained in IDEM's files. This information was not comprehensive enough to provide on a nonapplicability determination in the TSD or to provide a permit shield in the Part 70 Permit itself.

Tank 236 is subject to the requirements of 40 CFR 61, Subpart Y – National Emission Standard for Benzene Storage Vessels (326 IAC 14) because this storage vessel is used to store liquid having a specific gravity within the range of specific gravities specified in ASTM D836-84 for Industrial Grade Benzene, ASTM D835-85 for Refined Benzene-485, ASTM D2359-85a or 93 for Refined Benzene-535, and ASTM D4734-87 or 96 for Refined Benzene-545. Tank 236, which has a storage capacity greater than 10,000 gallons, uses a fixed roof with internal floating roof and double seals to comply with the standards in 40 CFR 61.271. For this storage vessel, the Permittee is required to comply with the inspection requirements in 40 CFR 61.272(a); the record keeping requirements in 40 CFR 61.276(a); and submit a periodic report as required by 40 CFR 61.475(a). Note that storage tank T-254 is also subject to 40 CFR 63, Subpart G; however, compliance with 40 CFR 63, Subpart Y satisfies the requirements of 40 CFR 63, Subpart G (National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater) (326 IAC 20-11). Therefore Sections D.8.2, D.8.3, and D.8.6 have been revised as follows:

D.8.2 Emission Standard for 40 CFR 61, Subpart Y [326 IAC 14][40 CFR 63, Subpart G]  
[326 IAC 20-12]

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Pursuant to 40 CFR 61.271(b), storage vessels 254 **and 236** shall be equipped with a fixed roof and an internal floating roof.

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D.8.3 Compliance Provisions for 40 CFR 61, Subpart Y [326 IAC 14][40 CFR 63, Subpart G]  
[326 IAC 20-12]

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Pursuant to 40 CFR 61.272, the Permittee shall comply with the following requirements for storage vessels 254 **and 236**:

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D.8.6 Reporting Requirements [40 CFR 61, Subpart Y] [326 IAC 14][40 CFR 63, Subpart G]  
[326 IAC 20-12]

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Pursuant to 40 CFR 61.275(a), the Permittee shall comply with the following reporting requirements for storage tanks 254 **and 236**:

**Specific Comment 14:**

Sections A.3(d) and D.9(d): The volume of the three (3) storage tanks listed should be 51,508 gallons.

**Response to Specific Comment 14:**

Sections A.3(d) and D.9(d) have been revised as follows:

- (d) Three (3) storage tanks (identified as T-200, T-201, and T-202) located at Plant 27, each with a storage capacity of ~~47,000~~ **51,508** gallons, and used to store formaldehyde. These tanks were constructed in 1992.

**Specific Comment 15:**

Sections A.3(e) and D.7(e): Tank 2652 is located at plant 47 and has a volume of 12,442.

**Response to Specific Comment 15:**

Sections A.3(e) and D.7(e) have been revised as follows:

Plant Location	Tank ID	Storage Capacity (gallons)	Date Constructed
<del>Plant 26</del> Plant 47	2652	<del>?</del> 12,442	1995

**Specific Comment 16:**

Reilly Industries, Inc. is aware that there have been applicability questions related to certain emission units. Reilly Industries, Inc. requests that the following rules and regulations be listed under the permit shield as not applicable. The following rules are not applicable to Reilly Industries, Inc.:

- (a) 326 IAC 8-5-3, Synthesized Pharmaceutical Manufacturing Operations;
- (b) 40 CFR 60, Subpart III, Synthetic Organic Chemical Manufacturing Industry, Air Oxidation Units;
- (c) 40 CFR 60, Subpart NNN, Synthetic Organic Chemical Manufacturing Industry, Distillation Operations
- (d) 40 CFR 60, Subpart K, Petroleum Liquid Storage
- (e) 40 CFR 60, Subpart Ka, Petroleum Liquid Storage
- (f) 40 CFR 61, Subpart E, Mercury Emissions

**Response to Specific Comment 16:**

OES has made the requested changes under the permit shield as a result of this comment:

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

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...  
**(h) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determination regarding this source:**

- (1) The Niacinamide Packaging facility is not subject to the requirements of 326 IAC 8-5-3, synthesized pharmaceutical manufacturing operations, because no VOCs are used at this facility.**
- (2) (A) Plant 27, Plant 38 and Plant 41 are not subject to the requirements of 40 CFR 60, Subpart III – Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical**

**Manufacturing Industry (SOCMI) Air Oxidation Unit Process (326 IAC 12) because these plants**

- (i) Do not have an air oxidation unit; and
  - (ii) Do not produce as a product, co-product, by-product, or intermediate any of the chemicals listed in 40 CFR 60.617.
- (B) Plants 40, 47, and 48 are not subject to the requirements of 40 CFR 60, Subpart III – Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes (326 IAC 12) because these plants do not produce as a product, co-product, by-product, or intermediate any of the chemicals listed in 40 CFR 60.617.
- (3) Plants 27, 38, 40, 41, 47, and 48 are not subject to the requirements of 40 CFR 60, Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12), because these plants do not produce any of the chemicals listed in 40 CFR 60.667 as a product, co-product, by-product, or intermediate.
- (4) None of the storage tanks at this facility are subject to 40 CFR 60, Subpart K because the storage tanks either have capacities of less than 40,000 gallons or they are not used to store petroleum liquids as defined in 40 CFR 60.111(b) and 40 CFR 60.111a(b).
- (5) None of the storage tanks at this facility are subject to the requirements of the New Source Performance Standards 40 CFR 60, Subpart Ka (326 IAC 12) because none of the storage tanks for for which construction, reconstruction, or modification commenced after May 19, 1978, and prior to July 23, 1984 have capacities of equal to or greater than 40,000 gallons and are not used to store petroleum liquids as defined in 40 CFR 60.111(b) and 40 CFR 60.111a(b).
- (6) The waste gas flare located at Plant 47 is not subject to the requirements of 40 CFR 60, Subpart E – Standards of Performance for Incinerators (326 IAC 12) because this incinerator does not burn solid waste. This incinerator doesn't meet the definition of an incinerator in 40 CFR 60.50.

**Specific Comment 17:**

Condition C.10 Compliance Monitoring: Reilly Industries, Inc. requests that the time frame be revised to 90 days from 60 days to correspond with Condition C.18(b).

**Response to Specific Comment 17:**

Condition C.10 has been revised as follows:

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ~~sixty (60)~~ **ninety (90)** days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ~~sixty (60)~~ **ninety (90)**, the Permittee may extend the

compliance schedule related to the equipment for an additional sixty (60) days provided the Permittee notifies:

...

**Specific Comment 18:**

Condition C.18(a): This section states that records shall be maintained for a period for five (5) years. However, other conditions in the permit allow for shorter time frames, like Condition D.9.33(c). This permit condition should be revised to allow different time frames that are stated elsewhere in the permit.

**Response to Specific Comment 18:**

326 IAC 2-7-5(3) requires the Part 70 permit to require records to be kept for a minimum of five (5) years. Condition D.9.33(c) requires records to be kept for a shorter time from in accordance with 326 IAC 14 and 40 CFR 63 Subpart H, not 326 IAC 2-7-5(3). Therefore, if the records were kept for longer than two years but less than five years Reilly Industries, Inc. would be in violation of Part 70 permit requirements, but not in violation of NESHAP requirements. No change has been made as a result of this comment.

**Specific Comment 19:**

Condition D.1.1: Reilly Industries, Inc. requests that the emission unit ordering in the tables under D.1.1 and D.1.2 be consistent with the ordering in the facility description box (EU 28-186N is out of order and some of the limits are incorrect.) Please modify the table in Condition D.1.1 to more accurately reflect the SIP and the SIP revision request.

**Response to Specific Comment 19:**

Once the requested SIP revision has been adopted, the source may apply for a permit modification. The order of the table in D.1.1 has been revised as follows:

Boiler I.D.	PM Limitation	
	in Tons per year	in lbs per MMBtu
11-112E	0.5	0.15
<del>30-2726S</del> 28-186N	<del>7.8</del> Shall burn only natural gas	<del>0.15</del> Shall burn only natural gas
<del>70-2722W</del> 30-2726S	<del>3.5</del> 7.8	0.15
<del>28-186N</del> 70-2722W	Shall burn only natural gas 3.5	0.15

No other changes have been made as a result of this comment.

**Specific Comment 20:**

Conditions D.1.5, D.1.8(c), D.2.5, D.2.7(c), D.3.5, D.3.6(b), D.4.7, D.4.10(d), and D.5.5: Reilly Industries, Inc. does not believe that the requirement for a Preventive Maintenance Plan should apply for these units. None of these emission units have a control device to comply with an applicable emission limit. Further, Reilly Industries, Inc. does not believe that there are any preventative maintenance measures that would relate to compliance with an applicable emission limit for these emission units.

Condition D.6.7: SO<sub>2</sub> and PM emissions are not reasonably expected to be emitted above a 10 pound per hour allowable emission rate or 25 tons per year of actual emissions, the wastewater handling operations are regulated by two NESHAP standards, and VOC emissions would likely

have emissions above 10 pound per hour allowable emission rate or 25 tons per year of actual emissions. The PMP requirement for this facility should be deleted. Further, Reilly Industries, Inc. does not believe that there are any preventative maintenance measures that would relate to compliance with an applicable emission limit for these emission units.

Condition D.9.19: PM and SO<sub>2</sub> are not reasonably expected to be emitted in quantities above an allowable of 10 pounds per hour or actual emission above 25 tons per year. The applicable HON regulations limit HAP and associated VOC with comparable or stricter preventative maintenance work practices than what could be added to a PMP and no synthetic limits have been taken to avoid applicable standards.

**Response to Specific Comment 20:**

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. If No. 2 fuel oil-fired boilers are not maintained, smoking and increased PM emissions will eventually result. OES and IDEM believe the PMPs are necessary. No changes have been made as a result of this comment. If other requirements have preventative maintenance work practices sufficient for the Preventive Maintenance Plan, the work practices may be submitted as the Preventive Maintenance Plan. IDEM and OES believe that PMPs are necessary for every boiler and heater that is fired using process gas because these units act as control devices. Therefore, the PMP requirements shall remain for units 28-186N, 30-2726S, 70-2722W, CB600-300, 722804, BX2707V, BXS2706Q, BS2740Q, BT2728S, BD2714V, DP2729Q, and 73714. IDEM and OES also believe that PMPs are necessary for units that have applicable NSPS and NESHAP requirements. Therefore, the PMP requirements shall remain for units 11-112E, CN5-400, CB-70K, BM2724W, Wastewater handling operations, and the facilities in Section D.9. It will often be acceptable for the source to create a PMP that only uses requirements from the NSPS or NESHAP. No changes have been made as a result of this comment.

**Specific Comment 21:**

Condition D.1.6:

- (a) This condition should be changed to 326 IAC 7-4-2 and/or 326 IAC 7-2-1. Permit condition D.1.6(a) should list 28-186N, not 11-112E.

- (b) Permit condition D.1.6(a) requires showing compliance with the sulfur dioxide emissions for the units specified in D.1.2 by the methods in D.1.6(a)(1) and (a)(2). Reilly Industries, Inc. would like clarification on permit condition D.1.6. First, the permit conditions D.1.6(a)(1) and (a)(2) mix the terminology of fuel and oil. Upon review of the requirement, Reilly Industries, Inc. believes that the sulfur dioxide limitations were derived for fossil fuel oil and do not take hazardous waste fuel into account. Since these units are subject to sulfur dioxide limitations, Reilly Industries, Inc. must show compliance with them. Reilly Industries, Inc. believes that the following terminology should be used to clarify the requirements: "fossil fuel oil or other liquid fuel."
- (c) The permit condition D.1.6(a) states that compliance with the sulfur dioxide limitations shall be demonstrated by vendor certification or sampling. Reilly Industries, Inc. believes that the vendor certification should apply to both fossil fuel oil and other liquid fuel, and should be revised to reflect this option.
- (d) Permit condition D.1.6(a)(2) details specific requirements for sampling oil. Upon review of these requirements, Reilly Industries, Inc. believes that these sampling requirements were derived from 40 CFR 60, Subpart Dc. These boilers are not subject to Subpart Dc since they were constructed, modified, or reconstructed prior to June 9, 1989. Reilly Industries, Inc. burns hazardous waste derived from operations at the facility in the boilers subject to this requirement. Based upon years of sampling and statistical analysis, Reilly Industries, Inc. believes that a semi-annual sampling and analysis plan based upon the plan outlined in the RCRA permit is sufficient enough to determine compliance with the sulfur dioxide limitations. Reilly Industries, Inc. would like a sampling and analysis plan, based upon the RCRA permit, incorporated into this permit for sampling hazardous waste for sulfur content.

**Response to Specific Comment 21:**

- (a), (b), (c): The IAC reference in Condition D.1.6 has been changed to more accurately reflect its origin. All references to "fuel" and "oil" in Condition D.1.6 have been changed to "fossil fuel oil or other liquid oil" to clarify that sulfur dioxide limitations were derived for fossil fuel oil and do not take hazardous waste fuel into account, and to clarify that vendor certification shall apply to both fossil fuel oil and other liquid fuel. Section D.1.6 has been revised as follows:

**D.1.6 Sulfur Dioxide Emissions and Sulfur Content** ~~[326 IAC 7-1.1-2]~~**[326 IAC 7-4-2][326 IAC 7-2-1]**

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions from boilers 44-442E **28-186N**, 30-2726S, and 70-2722W do not exceed the limitations in Condition D.1.2 by:
  - (1) Providing vendor analysis of **fossil fuel oil or other liquid** fuel delivered, if accompanied by a vendor certification, or;
  - (2) Analyzing the **fossil fuel oil or other liquid fuel** sample to determine the sulfur content of the **fossil fuel oil or other liquid fuel** via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) **Fossil fuel oil or other liquid fuel** samples may be collected from the fuel tank immediately after the fuel tank is filled and before any **fossil fuel oil or other liquid fuel** is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

(d) The specific requirements for sampling oil in Condition D.1.6(a)(2) were not derived from 40 CFR 60, Subpart, Dc. These are the same methods referred to in 326 IAC 3-7-4. Compliance must be demonstrated as outlined in 326 IAC 2-7, which refers to 326 IAC 3-7-4. Any alternative plan must be approved as a SIP revision.

**Specific Comment 22:**

Condition D.1.7: Since process gas is combusted in a gaseous state it is not expected that any visible emissions would be detectable at the stack exhaust. Reilly Industries, Inc. requests that process gas be treated in the same manner as natural gas and use the certification method rather than record keeping of visible emissions.

**Response to Specific Comment 22:**

Sections D.1.7 and D.1.8 have been revised as follows:

**D.1.7 Visible Emissions Notations**

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(a) Visible emission notations of boilers ~~11-112E~~, 30-2726S, and 70-2722W stack exhausts shall be performed once per shift during normal daylight operations when burning fuel oil, ~~process gas~~, and hazardous waste. A trained employee shall record whether emissions are normal or abnormal.

...

**D.1.8 Record Keeping Requirements**

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(a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) To certify compliance when burning natural gas only **or process gas only**, the Permittee shall maintain records of fuel used.

**Specific Comment 23:**

Condition D.1.8: This condition should reflect the use of fossil fuel oil. Condition (a)(3) should include process gas as well as natural gas. In condition (b), 11-112E should be eliminated since the draft condition D.1.7 should only require records when burning fuel oil. Further, the pertinent language found in condition D.1.7 should be found again in D.1.8(b), "during normal daylight operations when burning fuel oil and hazardous waste."

Section D.1.8(a) has been revised as a result of this comment:

D.1.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Calendar dates covered in the compliance determination period;
  - (2) Actual **fossil** fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) To certify compliance when burning natural gas **or process gas** only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of boilers 44-442E, 30-2726S, and 70-2722W stack exhausts once per shift **during normal daylight operations when burning fuel oil and hazardous waste.**

**Specific Comment 24:**

Conditions D.2.6 and D.2.7(b), and D.5.6: These conditions should be deleted. These emission units combust natural gas and process gases from the plant. If the process gas is in a gas state as it is fed in for combustion, as is natural gas it would not be expected that the particulate coming out of the stack would be visible. Reilly Industries, Inc. requests that process gas be treated as natural gas in terms of compliance monitoring.

**Response to Specific Comment 24:**

Condition D.5.6 has not been deleted. As a result of Specific Comment #3, some of the units listed in Condition D.5.6 may burn Fuel Oil #5. Conditions D.2.6, D.2.7(b), and D.5.6 have been revised as follows:

**Compliance Monitoring Requirements:**

~~D.2.6 Visible Emissions Notations~~

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- ~~(a) Visible emission notations of boiler CB600-300 stack exhaust shall be performed once per shift during normal daylight operations when burning process gas. A trained employee shall record whether emissions are normal or abnormal.~~

- ~~(b)~~ For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- ~~(c)~~ In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- ~~(d)~~ A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- ~~(e)~~ The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.2.7 6 Record Keeping Requirements

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- (a) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall maintain the following records:
  - (1) Daily fuel records.
  - (2) A certification signed by the owner or operator that the records of the fuel usage represent all of the fuel combusted during the period. The natural gas **and process gas** fired boiler certification does not require the certification of the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(b)~~ To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of boiler CB600-300 stack exhaust once per shift.
- ~~(e)~~**(b)** To document compliance with Condition D.2.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(d)~~**(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

...

#### D.5.6 Visible Emissions Notations

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- (a) Visible emission notations of heaters ~~722804, BX2707V, BX2706Q, BS2740Q, BT2728S, BM2724W, and BD2714V, SB2710P, NB2720Q, EP2729Q, and 732744~~ stack exhausts shall be performed once per shift during normal daylight operations when burning process gas. A trained employee shall record whether emissions are normal or abnormal.

#### Specific Comment 25:

Conditions D.2.7(a)(1) and D.3.6(a)(1): This condition requires the permittee to maintain daily fuel records. After review of Subpart Dc, Reilly Industries, Inc. does not understand the basis of the requirements under Subpart Dc and believes that it should be deleted from these sections of the permit.

**Response to Specific Comment 25:**

Boilers CB600-300 and CN5-400 are subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial Institutional Steam Generating Units (326 IAC 12) because they were constructed after June 9, 1989 and have heat input capacities greater than 10 MMBtu/hr and less than 100 MMBtu/hr. Pursuant to 40 CFR 60.48c(g), the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. No changes have been made as a result of this comment.

**Specific Comment 26:**

Condition D.4.8: This condition requires the permittee to comply with the sulfur emission limitations. However, the permit condition seems to mix 326 IAC 3-7-4 requirements with 40 CFR 60 Subpart Dc requirements. Please revise accordingly to reflect the correct requirements. Also, please revise the term fuel to fossil fuel oil.

**Response to Specific Comment 26:**

Pursuant to 326 IAC 7-2-1(e), fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion, and these data may be used to determine compliance or noncompliance with the emission limitations contained in 326 IAC 7-1.1, as stated in Condition D.4.8(a). Pursuant to 326 IAC 7-2-1(d), compliance or noncompliance with the emission limitations contained in 326 IAC 7-1.1 may be determined by a stack test conducted in accordance with 326 IAC 3-6 utilizing procedures outlined in 40 CFR 60, Appendix A, Method 6, as stated in Condition D.4.8(b). The rules has been referenced for clarification, and the term fuel has been replaced with the term fossil fuel oil as follows:

**D.4.8 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2-1]**

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Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the **fossil** fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:
  - (1) Providing vendor analysis of **fossil fuel oil** delivered, if accompanied by a certification; or
  - (2) Analyzing the oil sample to determine the sulfur content of the **fossil fuel** oil via the procedures in 40 CFR 60, Appendix A, Method 19.

**Specific Comment 27:**

Conditions D.4.10(a) and (b); D.4.10(a) should specify fossil fuel oil. Conditions D.4.10(a) and (b) combined would satisfy record keeping for D.4.1, D.4.2, and D.4.4. Further for conditions D.4.10(c) please include, “. . . during normal daylight operations when burning fossil fuel oil” for clarification.

**Response to Specific Comment 27:**

IDEM and OES prefer to keep D.4.10(a) and (b) as separate requirements for clarity. Condition D.4.10 has been revised as follows:

**D.4.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.4.1 and D.4.4, the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual **fossil** fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the **fossil** fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.4.2, the Permittee shall maintain records of the following:
  - (1) The amount and sulfur content of the distillate oil burned each month; and
  - (2) The amount of natural gas burned each month.
- (c) To document compliance with Condition D.4.9, the Permittee shall maintain records of visible emission notations of boiler CB-70K stack exhaust once per shift **during normal daylight operations when burning fossil fuel oil.**

**Specific Comment 28:**

Condition D.6.1(d): Reilly Industries, Inc. disagrees with this provision. If there are other requirements not incorporated into the permit then they should be included as required by 326 IAC 2-7-5.

**Response to Specific Comment 28:**

The provisions of 40 CFR 63 Subpart A are only incorporated by reference into this permit because the method of compliance has not yet been established by the source. Subpart A applicability depends on which compliance option is chosen by the permittee. Once IDEM and OES are aware of the method Reilly Industries, Inc. will use to comply with Subpart FFFF, Subpart A applicability may be determined. For clarification, Condition D.6.1 has been revised as follows:

D.6.1 General Provisions Relating to NESHAPs [326 IAC 20-1] [40 CFR 63, Subpart A] [326 IAC 14] [40 CFR 61, Subpart A]

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- (a) The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the Wastewater Treatment Plant except when otherwise specified in 40 CFR 63, Subpart DD.
- (b) The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14, apply to the sludge dryer except when otherwise specified in 40 CFR 61, Subpart E.
- (c) The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14, apply to the waste collection and treatment system except when otherwise specified in 40 CFR 61, Subpart FF.
- (d) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the miscellaneous organic chemical manufacturing affected source, as designated by 40 CFR 63.2440(b), except when otherwise specified in 40 CFR 63 Subpart FFFF. The Permittee must comply with these requirements on and after the effective date of 40 CFR 63 Subpart FFFF.
- (e) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph ~~(a)~~ (d) of this condition, **except as otherwise provided in this condition. The permit shield applies to Condition D.6.1, National Emissions Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturers - Notification Requirements.**

**Specific Comment 29:**

Condition D.6.10: Condition D.6.10(a)(2) should be revised to read "Table 1 of 40 CFR 63, Subpart DD" to avoid confusion that may arise since there is not a Table 1 of this subpart listed in the statement. Condition D.6.10(a)(2)(D) should be revised to read "to comply with 40 CFR 63, Subpart DD" to avoid confusion that may arise since there is not a subpart listed in this statement.

**Response to Specific Comment 29:**

Condition D.6.10 has been revised as follows:

D.6.10 Testing Methods and Procedures for 40 CFR 63, Subpart DD [326 IAC 20-23] [40 CFR 63.694]

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Pursuant to 40 CFR 63.694, the average VOHAP concentration of an off-site material at the point-of-delivery shall be determined using either direct measurement as specified in Condition D.6.10(a) or by knowledge as specified in Condition D.6.10(b).

- (a) Direct measurement to determine VOHAP concentration:
  - (1) . . .
  - (2) Analysis. Each collected sample must be prepared and analyzed in accordance with one of the following methods as applicable to the sampled off-site material for the purpose of measuring the HAP listed in Table 1 of ~~this subpart~~ **40 CFR 63, Subpart DD:**
    - (A) Method 305 in 40 CFR part 63, appendix A.

- (B) Method 25D in 40 CFR part 60, appendix A.
- (C) Method 624 in 40 CFR part 136, appendix A. If this method is used to analyze one or more compounds that are not on the method's published list of approved compounds, the Alternative Test Procedure specified in 40 CFR 136.4 and 40 CFR 136.5 must be followed.
- (D) Method 625 in 40 CFR part 136, appendix A. For the purpose of using this method to comply with this Subpart **DD of 40 CFR 63**, the owner or operator must perform corrections to these compounds based on the "accuracy as recovery" using the factors in Table 7 of the method. If this method is used to analyze one or more compounds that are not on the method's published list of approved compounds, the Alternative Test Procedure specified in 40 CFR 136.4 and 40 CFR 136.5 must be followed.

**Specific Comment 30:**

Condition D.7 and A.3(e): The construction date column should read "constructed on or before."

**Response to Specific Comment 30:**

Condition D.7 and Section A.3(e) have been revised as follows:

~~Date Constructed~~ **Constructed On or Before**

**Specific Comment 31:**

Condition D.7.2: This condition requires that tank 2969 be equipped with an external fixed roof and an internal floating roof to comply with 40 CFR 60 Subpart Kb. Reilly Industries, Inc. has always used a closed vent system with a flare to comply with 40 CFR 60, Subpart Kb. Reilly Industries, Inc. would like to have the permit requirements changed to reflect that a closed vent system and a flare are used to comply with 40 CFR 60 Subpart Kb.

**Response to Specific Comment 31:**

D.7.2 Standards Required by 40 CFR 60, Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart 60.112b]

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Pursuant to 40 CFR 60.112b(a)(4) **(3)**, storage tank 2969 shall be equipped with a fixed roof in combination with an internal floating roof meeting the following specifications **a closed vent system and control device meeting the following specifications:**

- (a) ~~The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating of the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting of the leg supports the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.~~ **The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, §60.485(b).**

- (b) ~~The internal floating roof shall be equipped with a closure device mounted between the wall of the storage vessel and the edge of the internal floating roof. The closure device used on the tank shall be equipped with foam or liquid-filled seals mounted in contact with the liquid (liquid-mounted seal).~~ **The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements §60.18 of the General Provisions.**
- (c) ~~Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.~~
- (d) ~~Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.~~
- (e) ~~Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.~~
- (f) ~~Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.~~
- (g) ~~Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.~~
- (h) ~~Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.~~
- (i) ~~Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.~~

Conditions D.7.4 and D.7.5 have also been revised as follows as a result of this comment:

D.7.4 Testing and Procedures Required by 40 CFR 60, Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart 60.113b]

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Pursuant to 40 CFR 60.113b(a) (c), the Permittee shall comply with the following requirements for storage tank 2969:

- (a) ~~Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling the storage vessel.~~ **Operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Administrator in accordance with §60.113b(c)(1) of this section,**

**unless the plan was modified by the Administrator during the review process. In this case, the modified plan applies.**

- (b) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the IDEM, OAQ in the inspection report required in Condition D.7.5(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (c) For vessels equipped with a double-seal system as specified in Condition D.7.2(b):
  - (A) Visually inspect the vessel as specified in Condition D.7.4(d) at least every 5 years; or
  - (B) Visually inspect the vessel as specified in Condition D.7.4(b).
- (d) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Conditions D.7.4(b) and (c) and at intervals no greater than 5 years in the case of vessels specified in Condition D.7.4(c).
- (e) Notify the IDEM, OAQ in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Conditions D.7.4(b) and (d) to afford the IDEM, OAQ the opportunity to have an observer present. If the inspection required by Condition D.7.4(d) is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the IDEM, OAQ at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the IDEM, OAQ at least 7 days prior to the refilling.

...

D.7.5 Reporting and Record Keeping Required by 40 CFR 60, Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart 60.115b and 60.116b]

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- (a) Pursuant to 40 CFR 60.115b(a) ~~(c)~~, the Permittee shall maintain copies of the following records and reports for storage tank 2969:
- (1) A report that describes the control equipment and certifies that the control equipment meets the specifications of Condition D.7.2(a) and Condition D.7.4(a). **A copy of the operating plan.**
  - (2) ~~Keep a record of each inspection performed as required by Conditions D.7.4(a), (b), (c), and (d). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). A record of the measured values of the parameters monitored in accordance with §60.113b(c)(2), Condition D.7.4.~~
  - ~~(3) If any of the conditions described in Condition D.7.4(b) are detected during the annual visual inspection required by Condition D.7.4(b), a report shall be furnished to the IDEM, OAQ within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.~~
  - ~~(4) After each inspection required by Condition D.7.4(c) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition D.7.4(c)(B), a report shall be furnished to the IDEM, OAQ within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of Conditions D.7.2(a) or D.7.4(c) and list each repair made.~~

**Specific Comment 32:**

Conditions D.8.4 and D.8.7: Storage tank 254 is regulated under 40 CFR 61, Subpart Y and has inspection requirements associated with the storage tank. The storage tanks listed in the Facility Description under (c) are all less than 10,000 gallons and each of these units has an allowable emission rate less than 10 pounds per hour and actual emission below 25 tons per year. These units do not have a control device and would not require preventative maintenance to keep a control device from malfunctioning. The requirement for a PMP should be deleted from this section.

**Response to Specific Comment 32:**

IDEM and OES believe that a PMP is necessary for this unit that has applicable NESHAP requirements. However, it may be acceptable for the source to create a PMP that only uses requirements from the NESHAP. IDEM and OES agree that PMPs are not necessary for the storage tanks listed in the Facility Description under (c). Condition D.8.4 has been revised as follows:

D.8.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~these facilities units~~ **units 236 and 254**.

**Specific Comment 33:**

Condition D.9.7: For Condition D.9.7(a), the wording, “identified as 140 Bottom and 75 Flow,” should be revised to read, “identified as ammonia stripper bottoms and raffinate stripper bottoms.” For Condition D.9.7(c), the wording, “The Permittee shall determine whether a wastewater stream is a Group 1 or Group wastewater...” should be revised to read, “The Permittee shall determine whether a wastewater stream is a Group 1 or Group 2 wastewater...”

**Response to Specific Comment 33:**

Condition D.9.7 has been revised as follows:

D.9.7 Process Wastewater Provisions [326 IAC 20] [40 CFR 63, Subpart G]

- (a) The Group 2 wastewater streams (identified as ~~140 Bottom and 75 Flow~~ **ammonia stripper bottoms and raffinate stripper bottoms**) shall comply only with the recordkeeping requirements in 40 CFR 63.147(b)(8).
- (b) . . .
- (c) The Permittee shall determine whether a wastewater stream is a Group 1 or Group 2 wastestream in accordance with the provisions in 40 CFR 63.132(c). Total annual average concentration of compounds listed in Table 9 of 40 CFR 63, Subpart G shall be determined according to the procedures specified in 40 CFR 63.144(b). The annual average flow rate shall be determined according to the procedures specified in 40 CFR 63.144(c).

**Specific Comment 34:**

Conditions D.9.23, D.9.24, D.9.25, D.9.26, and D.9.27: These requirements are presumably included to monitor PM emissions from the catalyst regenerator and the cyclone. The allowable PM emissions from this facility and its control devices are below 10 lb/hr. As such, Reilly Industries, Inc. would request that the compliance monitoring provisions in the referenced sections be removed for this relatively small emission unit.

**Response to Specific Comment 34:**

The allowable emissions from this facility are not specified in pounds per hour, and emissions calculations have not been submitted by the source. 326 IAC 2-7-5 and 326 IAC 2-7-6 allow IDEM and OES to determine appropriate compliance measures. When control is needed to comply with requirements, monitoring is needed to demonstrate compliance. The particulate emissions are limited to 0.03 grains per dry standard cubic foot by Condition D.9.18 (326 IAC 6-1-2(a)). Therefore, Condition D.9.23 (now D.9.25) is necessary to indicate compliance with 326 IAC 6. The requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. Conditions D.9.24, D.9.25, and D.9.26 (now D.9.26, D.9.27, and D.9.28, respectively) are also necessary since the cyclone is used to comply with Condition D.9.18. Therefore, Condition D.9.27 (now D.9.32) is necessary to document compliance with Conditions D.9.24 and D.9.25 (now D.9.26 and D.9.27, respectively). No changes have been made as a result of this comment.

**Specific Comment 35:**

Condition D.9.24: This condition requires the Permittee to take reasonable response steps when the pressure drop across the cyclone is outside the normal range of 3.0 to 6.0 inches of water. Reilly Industries, Inc. believes that this requirement is prohibitive to the proper operation of the cyclone. Based upon the design specifications of the cyclone the normal operating range for the

cyclone is 3.0 to 50.0 inches of water. Reilly Industries, Inc. requests that this permit condition be modified to reflect the proper operating range for the cyclone.

**Response to Specific Comment 35:**

Because pressure drop range is not an appropriate parameter to determine compliance for a cyclone, Condition D.9.24 (now D.9.26) and Condition D.9.32(b) has been removed. Other Conditions have been renumbered appropriately:

~~D.9.26~~ **Parametric Monitoring**

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~~The Permittee shall record the total static pressure drop across the cyclone used in conjunction with the Catalyst Regenerator, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the cyclone is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.~~

~~The instrument used for determining the pressure shall comply with Section C—Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and OES, and shall be calibrated at least once every six (6) months.~~

...

~~D.9.32~~ **D.9.31 Record Keeping Requirements**

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- (a) To document compliance with Condition D.9.25, the Permittee shall maintain records of visible emission notations of the Catalyst Regenerator stack exhaust once per shift.
- ~~(b)~~ ~~To document compliance with Condition D.9.26, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.~~
- ~~(c)~~ **(b)** To document compliance with Condition ~~D.9.27 and D.9.30~~ **D.9.26 and D.9.29**, the Permittee shall maintain records of the results of the inspections required under Condition D.9.27 and D.9.30.
- ~~(d)~~ **(c)** To document compliance with Condition D.9.20, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(e)~~ **(d)** To document compliance with Condition D.9.19, the Permittee shall maintain records of the hours of operation of the drying facility once per shift.
- ~~(f)~~ **(e)** To document compliance with Condition ~~D.9.29~~ **D.9.28**, the Permittee shall maintain records of the flow rate for the scrubber once per shift during normal operation.
- ~~(g)~~ **(f)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Specific Comment 36:**

Condition D.12.6: This condition states that the packaging facilities particulate emissions shall be limited to 0.03 grains per dry standard cubic foot. Reilly Industries, Inc. believes that the units are exempt from 326 IAC 6-1-2(a) as stated in the letter from the City dated October 23, 2000. Furthermore, 326 IAC 6-1-1 states that the units that have actual emissions over 10 tons or more of particulate matter shall comply with 326 IAC 6-1-2. The actual emission of particulate matter from each unit is less than 10 tons per year, as stated in the application for these units dated August 14, 2000.

**Response to Specific Comment 36:**

As stated in the TSD, the Niacinamide Packaging Unit is subject to the requirements of 326 IAC 6-1 because the actual emissions of PM from the entire source are greater than 10 tons per year. No changes have been made as a result of this comment.

**Specific Comment 37:**

Reilly Industries, Inc. is not a synthesized pharmaceutical manufacturing operation under 326 IAC 8-5-3. Reilly Industries, Inc. is a Synthetic Organic Chemical Manufacturing facility. Reilly Industries, Inc. has one product that is a precursor to the manufacture of vitamins. The manufacture of vitamins is not associated with the production of synthetic pharmaceuticals. Although a definition of synthetic pharmaceutical manufacture is lacking in the SIP, the intent was not to regulate the manufacture of chemicals that are precursors to the manufacture of vitamins. Reilly Industries, Inc. requests that this condition be deleted.

**Response to Specific Comment 37:**

Vitamins are pharmaceutical products. Reilly Industries, Inc. uses chemical synthesis to manufacture precursors to various grades of vitamin B-3. Therefore, Reilly Industries, Inc. manufactures pharmaceutical products by chemical synthesis, and is subject to 326 IAC 8-5-3. No changes have been made as a result of this comment.

**Specific Comment 38:**

Section D.13: This section should be removed from the permit in its entirety. Section D.13 is a requirement to comply with 40 CFR 63, Subpart GGGGG. Reilly Industries, Inc. is exempt from these requirements for two reasons. First, the requirements should be removed because the facility is not a major source as defined in the rules. Second, 40 CFR 63.7781(b)(2) exempts site remediation being done under the authority of the Comprehensive Environmental Response and Compensation Liability Act (CERCLA) as a remedial action or non time critical removal action. The soil remediation being done at Reilly Industries, Inc. is in response to a remedial action through a CERCLA order and therefore should be exempt.

**Response to Specific Comment 38:**

Reilly Industries, Inc. has incorrectly cited the rule exempting CERCLA remedial actions. The correct rule is 40 CFR 63.7881(b)(2). Pursuant to this rule, the remediation conducted at Reilly Industries, Inc. is exempt from 40 CFR 63, Subpart GGGGG. Section D.13 has been deleted as follows:

**~~SECTION D.13~~ ~~FACILITY OPERATION CONDITIONS~~**

<b><del>Facility Description [326 IAC 2-7-5(15)] Insignificant Activities</del></b>
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- (i) ~~Soil remediation units constructed in 1999, and consisting of eleven (11) individual soil vapor extraction wells. Only five (5) vapor extraction wells are used for extracting vapors from the subsurface soils at any given time. The soil remediation units have VOC emissions less than 3 pounds per hour or 15 pounds per day; single HAP emissions less than 5 pounds per day or 1 ton per year; and combined HAP emissions less than 12.5 pounds per day or 2.5 tons per year.~~

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

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.13.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]**

- (a) ~~The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the soil remediation units, as designated by 40 CFR 63.7882(a), except when otherwise specified in 40 CFR 63 Subpart GGGGG. The Permittee must comply with these requirements on and after October 8, 2003.~~
- (b) ~~Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~

#### **D.13.2 National Emissions Standards for Hazardous Air Pollutants for Site Remediation [40 CFR Part 63, Subpart GGGGG]**

- (a) ~~The affected sources for the soil remediation units, including process vents, remediation material management units, and equipment components, are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Site Remediation, (40 CFR 63, Subpart GGGGG), effective October 8, 2003. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart GGGGG on and after October 8, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to October 8, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~
- (b) ~~The definitions in 40 CFR 63, Subpart GGGGG, Section CFR 63.7957 are applicable to the Permittee.~~

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)][326 IAC 2-7-19]**

#### **D.13.3 National Emissions Standards for Hazardous Air Pollutants for Site Remediation- Notification Requirements [40 CFR 63, Subpart GGGGG]**

- (a) ~~Pursuant to 40 CFR 63.7950, the Permittee shall submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), 63.8(f)(4) and (6), and 63.9(b) through (h) that apply to the affected source and chosen compliance method. These notifications include, but are not limited to, the following:~~
- (1) ~~An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than February 5, 2004;~~
- (2) ~~A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) in accordance with 40 CFR 63.7950(e). The Notification of Compliance Status must be submitted:~~

- (A) ~~Before the close of business on the 30th calendar day following completion of the initial compliance demonstration for each initial compliance demonstration that does not include a performance test; and~~
- (B) ~~Before the close of business on the 60th calendar day following the completion of the performance test according to the requirement specified in 40 CFR 63.10(d)(2) for each initial compliance demonstration that includes a performance test or design evaluation. The Permittee shall submit the complete design evaluation and supporting documentation and the performance test results, as applicable.~~
- (3) ~~If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.7950(a) and (d); and~~
- (4) ~~If required to use a continuous monitoring system (CMS), notifications, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test, as required by 40 CFR 63.7950(a).~~

(b) ~~The notifications required by paragraph (a) shall be submitted to:~~

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

~~and~~

~~United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590~~

~~The notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~D.13.4 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]~~

~~The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.~~

- (a) ~~The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart GGGGG, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.~~
- (b) ~~The significant permit modification application shall be submitted no later than January 8, 2006.~~

~~(c) — The significant permit modification application shall be submitted to:~~

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

Section A.3(j) has also been deleted as a result of this comment:

~~(j) — Soil remediation units constructed in 1999, and consisting of eleven (11) individual soil vapor extraction wells. Only five (5) vapor extraction wells are used for extracting vapors from the subsurface soils at any given time. The soil remediation units have VOC emissions less than 3 pounds per hour or 15 pounds per day; single HAP emissions less than 5 pounds per day or 1 ton per year; and combined HAP emissions less than 12.5 pounds per day or 2.5 tons per year.~~

**Specific Comment 39:**

Reilly Industries, Inc. would like to make note that there are two small cold cleaners at the facility that meet the definition as an insignificant activity. These units are not identified in the permit, and they are subject to the requirements of 326 IAC 8-3-5.

**Response to Comment 39:**

326 IAC 8-3-2 apply to the two cold solvent cleaning units since the source is located in Marion County and the units were existing as of July 1, 1990 and they are located at a source that has the potential to emit of greater than one hundred (100) tons per year. These units are not subject to 326 IAC 8-3-5 because they have remote solvent reservoirs. Section A.13(j) has been replaced as follows:

**(j) Cold cleaning operating with potential emissions of less than three (3) pounds per hour (lbs/hr) or fifteen (15) pounds per day (lbs/day) of VOC.**

Section D.12 has been added as follows:

**SECTION D.12 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)] Insignificant Activities**

**(j) Cold cleaning operating with potential emissions of less than three (3) pounds per hour (lbs/hr) or fifteen (15) pounds per day (lbs/day) of VOC.**

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

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.12.1 Cold Cleaner Degreaser Operations and Control [326 IAC 8-3-2]**

**Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:**

- (a) Equip the cleaner with a cover;**
- (b) Equip the cleaner with a facility for draining cleaned parts;**

- (c) **Close the degreaser cover whenever parts are not being handled in the cleaner;**
- (d) **Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;**
- (e) **Provide a permanent, conspicuous label summarizing the operating requirements;**
- (f) **Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty (20%) of the waste solvent (by weight) can evaporate into the atmosphere.**

**TSD Comment 1:**

Page 15, Potential to Emit (c), page 16, item (c), and page 37, first paragraph: There seems to be contradiction. Looking at 326 IAC 2-2, one of the source categories listed is chemical manufacturing. Reilly Industries, Inc. is a chemical manufacturer. Page 16, item (c) should be changed.

**Response to TSD Comment 1:**

Page 16, item (c) is incorrect as written in the TSD. Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2 or 2-3, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD applicability. This addendum to the TSD serves to document recognition of this error. In addition, VOC is a precursor for ozone, and Marion County has been designated as nonattainment for ozone (see Change 3). Therefore, 326 IAC 2-1.1-5 (Air quality requirements) must be addressed. This permit does not do any of the things listed in 326 IAC 2-1.1-5. Therefore, this permit may be issued.

**TSD Comment 2:**

Page 20, Federal Rule Applicability – Plant 27 (b)(2): Here the TSD states that benzene is used as a reactant. Benzene is not used as a reactant.

**Response to TSD Comment 2:**

IDEM and OES agree with this comment, and this addendum serves to document the error. Since this has no effect on rule applicability, no changes to the permit have occurred as a result of this comment.

**TSD Comment 3:**

Page 22, Federal Rule Applicability – Plant 27, Transfer Operations: This should only state that Subparts F, G, and H do not apply because the loading racks do not meet the definitions in 40 CFR 63.101.

**Response to TSD Comment 3:**

IDEM and OES agree with this comment, and this addendum serves to document the error. Since this has no effect on rule applicability, no changes to the permit have occurred as a result of this comment.

**TSD Comment 4:**

Page 25, Federal Rule Applicability – Plant 41(g) and Page 26 Plant 41(j): The phrase, “as intended product,” should be added to the reason for excluding that subpart.

**Response to TSD Comment 4:**

Plant 41 is not subject to 40 CFR 63, Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards because this plant does not manufacture any of the following categories of chemicals **as intended product**: acetal resins; acrylic and modacrylic fibers; carbon black; cyanide chemicals; ethylene; hydrogen fluoride; polycarbonates; and spandex. Plant 41 is not subject to 40 CFR 63, Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards because this plant does not manufacture any of the following categories of chemicals **as intended product**: acetal resins; acrylic and modacrylic fibers; carbon black; cyanide chemicals; ethylene; hydrogen fluoride; polycarbonates; and spandex. This addendum serves to document this clarification. Since this has no effect on rule applicability, no changes to the permit have occurred as a result of this comment.

**TSD Comment 5:**

Page 26, Federal Rule Applicability – Plant 41(i): The last sentence should read, “Since all of the equipment subject to this NESHAP is also subject . . .”

**Response to TSD Comment 5:**

IDEM and OES agree with this comment, and this addendum serves to document the error. Since this has no effect on rule applicability, no changes to the permit have occurred as a result of this comment.

**TSD Comment 6:**

Page 32, Federal Rule Applicability – Benzene Storage Tank 254 and the following storage tanks... (b), (c), (c), and (e): 40 CFR 60 Subparts K and Ka only apply to storage vessels for petroleum liquids. The tanks listed in the table prior to these items do not store petroleum liquids and therefore these Subparts are not applicable regardless of their capacity.

**Response to TSD Comment 6:**

IDEM and OES agree with this comment, and this addendum serves to document the error. Since this has no effect on rule applicability, no changes to the permit have occurred as a result of this comment.

**TSD Comment 7:**

Page 33, Federal Rule Applicability – Storage tanks not used to store benzene (a)(2); The vapor pressure listed, as 2.2 psi should be revised to 15.0kPa, since this is the standard in the rule and 2.2 psi converts to 15.2 kPa. If a conversion was to be included a value of 2.18 psi should be incorporated since it converts to 15.0kPa.

**Response to TSD Comment 7:**

IDEM and OES agree with this comment, and this addendum serves to document the error. Since this has no effect on rule applicability, no changes to the permit have occurred as a result of this comment.

**TSD Comment 8:**

Page 33, Federal Rule Applicability – Storage tanks not used to store benzene (a)(3): The vapor pressure listed as 0.5 psi should be revised to 3.5 kPa, since this is the standard in the rule.

**Response to TSD Comment 8:**

IDEM and OES agree with this comment, and this addendum serves to document the error. Since this has no effect on rule applicability, no changes to the permit have occurred as a result of this comment.

**TSD Comment 9:**

Page 37, State Rule Applicability – Entire Source, 326 IAC 2-2 (Prevention of Significant Deterioration): The second paragraph states that a vent gas control system was added to Plant 2. This should be revised to state that it was added to Plant 47, not Plant 2.

**Response to TSD Comment 9:**

IDEM and OES agree with this comment, and this addendum serves to document the error. No changes to the permit have occurred as a result of this comment.

**TSD Comment 10:**

Page 37 and 38, State Rule Applicability – Entire Source 326 IAC 2-2 (Prevention of Significant Deterioration): This section does not mention the increase in the burner size of emission unit 732704 from 36.0 MMBtu/hr to 56.5 MMBtu/hr input. This was done through a permit modification, issued on November 4, 1998 and it states that PSD does not apply to the modification since emissions increase is less than the allowable under the rule. Reilly Industries, Inc. believes that this should be included in the permit for clarification purposes and future reference.

**Response to TSD Comment 10:**

IDEM and OES agree that this should be included for clarification purposes and future reference. This addendum serves to document the clarification. No changes to the permit have occurred as a result of this comment.

**Upon Further Review, IDEM, OAQ and OES have also decided to make the following changes to the draft Part 70 Operating Permit:**

**Change 1:**

On April 24, 2004, the proposed NESHAP for hazardous waste combustors, 40 CFR 63, Subpart EEE, Phase II was published in the Federal Register. Three boilers, identified as 28-186N, 30-2726S, and 70-2722W, may be subject to the NESHAP because they are boilers that burn hazardous waste. Therefore, if EPA doesn't finalize the proposed revisions to EEE by August 13, 2005, a Clean Air Act Section 112(j) Part II application will be due for this source. The permit has been modified as follows:

**C.21 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(b) and (e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]**

- 
- (a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

- (b) **Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:**
- (1) **The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;**
  - (2) **The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or**
  - (3) **The MACT standard or standards for the affected source categories included at the source are promulgated.**
- (c) **Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:**

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

**and**

**United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590**

**Change 2:**

Conditions regarding 40 CFR 63 Subpart DDDDD, D.1.9(a), D.2.7(a), D.3.7(a), D.4.11(a), and D.5.8(a) have been revised as follows:

- (a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the effective date of 40 CFR 63, Subpart DDDDD as required by 40 CFR 63.7545(b) **November 12, 2004.**

Conditions regarding 40 CFR 63 Subpart DDDDD, D.1.4(a), D.2.4(a), D.3.4(a), D.4.6(a), and D.5.4(a) have been revised as follows:

- (a) The affected sources are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective

date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three years after the date of publication of the final rule for 40 CFR 63, Subpart DDDDD in the Federal Register **November 12, 2004**.

**Change 3:**

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Marion County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary industrial organic chemical plant.

Responsible Official:	President
Source Address:	1500 South Tibbs Avenue, Indianapolis, Indiana 46242
General Source Phone Number:	(317) 247-8141
SIC Code:	2899 and 2869
County Location:	Marion
Source Location Status:	<b>Nonattainment for ozone under the 8-hour standard</b>
Source Status:	Attainment for all <b>other</b> criteria pollutants Part 70 Permit Program Major Source, under PSD <b>and Nonattainment NSR</b> Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

Although the Technical Support Document (TSD) will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remain unchanged; therefore will not be shown below other than in the table County Attainment Status.

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
<b>1-hour Ozone</b>	maintenance attainment
<b>8-hour Ozone</b>	<b>basic nonattainment</b>
CO	attainment
Lead	unclassifiable

~~(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.~~

**(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and**

**maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for nonattainment new source review.**

**Change 4:**

IDEM has changed the name of the section previously known as I/M & Billing Section to Billing, Licensing, and Training. Condition B.23 has been updated to reflect this change:

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]**

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and OES within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or OES the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~I/M & Billing~~, **Licensing, and Training** Section), to determine the appropriate permit fee.

**Change 5:**

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

**B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]**

**Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.**

**Change 6:**

It is no longer necessary to have C.26 Application Requirements for Section 112(j) in any new permits; therefore, this condition is being removed.

**Part 2 MACT Applications Submittal Requirements**

**C.21 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(b) and (e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]**

- (a) ~~The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~
- (b) ~~Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40~~

~~CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~

- ~~(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~
- ~~(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~
- ~~(3) The MACT standard or standards for the affected source categories included at the source are promulgated.~~

~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case by case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:~~

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

~~and~~

~~United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590~~