

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT
and
St. Joseph County Health Department**

**Safety & Environmental Resources, Inc.
1122 Division Street
Mishawaka, Indiana 46545**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T141-7673-00166	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and St. Joseph County Health Department. 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)]

The Permittee owns and operates stationary petroleum and coal products operation.

Responsible Official: Kevin Parks
Source Address: 1122 Division Street, Mishawaka, IN 46545
Mailing Address: P.O. Box 1308, Mishawaka, IN 46546-1308
SIC Code: 2999
County Location: St. Joseph
County Status: Attainment area for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD and Emission Offset Rules

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

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

- (a) One (1) wastewater storage/transfer facility, constructed in 1998, with the maximum capacity to store 47,000 gallons of wastewater, consisting of the following equipment:
 - (1) Six (6) wastewater storage tanks (Tanks L, M, Q, R, S, and T) with capacities of 11500, 5500, 7500, 7500, 7500, and 7500 gallons, respectively;
- (b) One (1) waste oil treatment facility, constructed in 1989, with a capacity to process 362 gallons of oil per hour (3016 pounds per hour), exhausting through stacks F1 and F2, consisting of the following equipment:
 - (1) Nineteen (19) storage tanks (Tanks 3, 5, 6, 7, 8, 9, 10, 11, 12, C, D, E, F, O, P, T3, T4, 1, and 2) with capacities ranging between 500-20100 gallons; and
 - (2) Seven (7) waste oil treatment tanks (Tanks A, B, G, H, I, J, and K) with capacities of 7500, 10000, 4000, 5000, 11500, 11500, and 12500 gallons respectively;
- (c) One (1) solids processing facility, constructed in 1995, with a capacity to process 3 pounds per hour of materials from the waste oil treatment facility and 500 pounds per hour from petroleum contaminated soils, exhausting through stack F3; and
- (d) One (1) bulk petroleum storage facility, containing the following tanks:
 - (1) Five (5) tanks for mineral spirits (Tanks M1-M5) with capacities of 1750, 1750, 1750, 1750 and 2750 gallons, respectively;
 - (2) Three (3) tanks for diesel fuel storage (Tanks 4, T1 and T2) with capacities of 20100, 10500 and 1000 gallons, respectively; and

- (3) One (1) diesel fuel storage boiler (Tank N) with a capacity of 5500 gallons.

A.3 Specifically Regulated 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) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing containing less than five-tenths (0.5) percent sulfur by weight;
- (1) One (1) boiler, installed in 1997, utilizing a heat input rate of 2.0 MMBtu per hour, combusting No. 2 distillate fuel oil, exhausting to stack B1.
- (c) Other activities or categories not previously defined:
- (1) Two (2) 0.35 MMBtu per hour, natural gas fired power washers.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

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

B.4 Enforceability [326 IAC 2-7-7(a)]

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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

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

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, IN 46601-1870

- (b) The Permittee shall furnish to IDEM, OAM, and St. Joseph County Health Department within a reasonable time, any information that IDEM, OAM and St. Joseph County Health Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM and St. Joseph County Health Department copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM and St. Joseph County Health Department along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall 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 Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, IN 46601-1870

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, OAM, St. Joseph County Health Department on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM St. Joseph County Health Department 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.12 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]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each 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 its control, the PMP 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, IN 46601-1870

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and St. Joseph County Health Department upon request and shall be subject to review and approval by IDEM, OAM and .

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and St. Joseph County Health Department within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Telephone Number (St. Joseph County Health Department): 219-235-9775
Facsimile Number (St. Joseph County Health Department): 219-235-7558
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, IN 46601-1870

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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, and St. Joseph County Health Department 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, OAM, and St. Joseph County Health Department by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. 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:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and St. Joseph County Health Department 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and St. Joseph County Health Department has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and St. Joseph County Health Department has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 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 Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, IN 46601-1870

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and St. Joseph County Health Department and 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, OAM, and St. Joseph County Health Department 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, OAM, and St. Joseph County Health Department at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and St. Joseph County Health Department and may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM 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).

Request for renewal shall be submitted to:

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

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, IN 46601-1870

- (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, OAM, and St. Joseph County Health Department on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, and St. Joseph County Health Department 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.
- (c) 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, OAM and St. Joseph County Health Department takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and St. Joseph County Health Department any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM and St. Joseph County Health Department 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.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, IN 46601-1870

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

- (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)(D)(i) 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (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 approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, IN 46601-1870

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, OAM and St. Joseph County Health Department in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) 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 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, OAM, and St. Joseph County Health Department or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

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

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, St. Joseph County Health Department 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and St. Joseph County Health Department or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and St. Joseph County Health Department nor an authorized representative, may disclose the information unless and until IDEM, OAM, and St. Joseph County Health Department makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM and St. Joseph County Health Department acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, and St. Joseph County Health Department Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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.

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

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 vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

The requirement that the inspector be accredited is federally enforceable.

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

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

- (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 methods approved by IDEM, OAM.

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

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

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

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

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

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

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

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

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

C.11 Monitoring Methods [326 IAC 3]

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

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

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

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;

- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that 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 an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.

C.14 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not 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.15 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] [326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
- (1) Indicate actual emissions of criteria pollutants from the source;
 - (2) Indicate actual emissions of other regulated pollutants from the source.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) wastewater storage/transfer facility, constructed in 1998, with the maximum capacity to store 47,000 gallons of wastewater, consisting of the following equipment:
 - (1) Six (6) wastewater storage tanks (Tanks L, M, Q, R, S, and T) with capacities of 11500, 5500, 7500, 7500, 7500, and 7500 gallons, respectively;
- (b) One (1) waste oil treatment facility, constructed in 1989, with a capacity to process 362 gallons of oil per hour (3016 pounds per hour), exhausting through stacks F1 and F2, consisting of the following equipment:
 - (1) Nineteen (19) storage tanks (Tanks 3, 5, 6, 7, 8, 9, 10, 11, 12, C, D, E, F, O, P, T3, T4, 1, and 2) with capacities ranging between 500-20100 gallons; and
 - (2) Seven (7) waste oil treatment tanks (Tanks A, B, G, H, I, J, and K) with capacities of 7500, 10000, 4000, 5000, 11500, 11500, and 12500 gallons respectively;
- (c) One (1) solids processing facility, constructed in 1995, with a capacity to process 3 pounds per hour of materials from the waste oil treatment facility and 500 pounds per hour from petroleum contaminated soils, exhausting through stack F3; and
- (d) One (1) bulk petroleum storage facility, containing the following tanks:
 - (1) Five (5) tanks for mineral spirits (Tanks M1-M5) with capacities of 1750, 1750, 1750, 1750 and 2750 gallons, respectively;
 - (2) Three (3) tanks for diesel fuel storage (Tanks 4, T1 and T2) with capacities of 20100, 10500 and 1000 gallons, respectively; and
 - (3) One (1) diesel fuel storage boiler (Tank N) with a capacity of 5500 gallons.

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

D.1.1 VOC Limitation [326 IAC 8-1-6]

Total VOC usage in the wastewater storage/transfer facility shall be limited such that associated VOC emissions are less than 25 tons per twelve (12) consecutive month period. Transportation limitations limit influent wastewater storage to 21,000 gallons per day. This is equivalent to VOC emissions of 6.39 tons per year. Compliance with this limit makes 326 IAC 8-1-6 (BACT) not applicable.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a).

D.1.4 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1). Records maintained for (1) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) For the wastewater storage/transfer facility, the volume usage and VOC content of each material used shall be recorded on a daily basis.
- (b) Pursuant to 326 IAC 8-9-6(a), the Permittee shall maintain records in accordance with (1) through (4) below.
- (1) The vessel identification number;
- (2) The vessel dimensions;
- (3) The vessel capacity; and
- (4) A description of the emission control equipment for each vessel or a schedule for installation of emission control equipment on each vessel with a certification that the emission control equipment meets the applicable standards.

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (1) Two (2) 0.35 MMBtu per hour, natural gas fired power washers.
- (2) One (1) boiler, installed in 1997, utilizing a heat input rate of 2.0 MMBtu per hour, combusting No. 2 distillate fuel oil, exhausting to stack B1.

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

D.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 0.70 MMBtu per hour heat input power washers and the 2.0 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and St. Joseph County Health Department**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Safety and Environmental Resources, Inc.
Source Address: 1122 Division Street, Mishawaka, IN 46545
Mailing Address: P.O. Box 1308, Mishawaka, IN 46545
Part 70 Permit No.: T-141-7673-00166

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and St. Joseph County Health Department**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Safety and Environmental Resources, Inc.
Source Address: 1122 Division Street, Mishawaka, IN 46545
Mailing Address: P.O. Box 1308, Mishawaka, IN 46545
Part 70 Permit No.: T-141-7673-00166

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and St. Joseph County Health Department**

Part 70 Quarterly Report

Source Name: Safety & Environmental Resources, Inc.
Source Address: 1122 Division Street, Mishawaka, IN 46545
Mailing Address: P.O. Box 1308, Mishawaka, IN 46545
Part 70 Permit No.: T141-7673-00166
Facility: Wastewater Storage/Transfer Facility
Parameter: VOC Usage
Limit: less than 25.0 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons/year)
	This Month	Previous 11 Months	12 Month Total

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
St. Joseph County Health Department
PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Safety and Environmental Resources, Inc.
Source Address: 1122 Division Street, Mishawaka, IN 46545
Mailing Address: P.O. Box 1308, Mishawaka, IN 46545
Part 70 Permit No.: T-141-7673-00166

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

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

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management
and
St. Joseph County Health Department**

**Technical Support Document (TSD) for a Part 70 Operating Permit and
Enhanced New Source Review (ENSR)**

Source Background and Description

Source Name: Safety & Environmental Resources, Inc.
Source Location: 1122 Division Street, Mishawaka, IN 46545
County: St. Joseph
SIC Code: 2999
Operation Permit No.: T141-7673-00166
Permit Reviewer: Yvette de los Angeles/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Safety & Environmental Resources, Inc. relating to a petroleum and coal products operation.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source consists of the following unpermitted facilities/units:

- (1) One (1) wastewater treatment facility, constructed in 1989, with the capacity to process 43,000 gallons of wastewater per day (14,943 pounds per hour), exhausting through stacks F1 and F2, consisting of the following equipment:
 - (a) One (1) primary separation tank (Tank L) with a capacity of 11500 gallons;
 - (b) Four (4) primary treatment tanks (Tanks A, I, J, and K) with capacities of 7500, 11500, 11500, and 12500, respectively;
 - (c) Two (2) secondary treatment tanks (Tanks O and T) with capacities of 18200 and 7500 gallons, respectively;
 - (d) Two (2) floc separation tanks (Tanks B and G) with capacities of 10135 and 4000 gallons, respectively; and
 - (e) One (1) activated carbon system with a capacity of 10,065 pounds per hour;

- (2) One (1) waste oil treatment facility, constructed in 1989, with a capacity to process 362 gallons of oil per hour (3016 pounds per hour), exhausting through stacks F1 and F2, consisting of the following equipment:
 - (a) Eighteen (18) storage tanks (Tanks C, D, E, F, P, 101, 102, 104-110, 112, 3, and 4) with capacities ranging between 500 - 20100 gallons; and
 - (b) Six (6) waste oil treatment tanks (Tanks H, M, N, Q, R, and S) with capacities of 5000, 5500, 5500, 7500, 7500, and 7500 gallons, respectively;

- (3) One (1) solids processing facility, constructed in 1995, with a capacity to process 3 pounds per hour of materials from the waste oil treatment facility and 500 pounds per hour from petroleum contaminated soils , exhausting through stack F3; and
- (4) One (1) bulk petroleum storage facility, containing five (5) tanks for mineral spirits (Tanks 1-5) with capacities of 1750, 1750, 1750, 1750 and 2750 gallons, and three (3) tanks for diesel fuel storage (Tanks 103, 1, and 2) with capacities of 20100, 10500 and 1000 gallons.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

All of the unpermitted facilities are to be reviewed under the ENSR process.

Insignificant Activities

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
- (2) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing containing less than five-tenths (0.5) percent sulfur by weight;
 - (a) Two (2) space heaters, each installed in 1992, utilizing a heat input rate of 0.5 and 0.4 million British thermal units (MMBtu) per hour, each combusting waste oil fuel, each exhausting to stacks H1 and H2, respectively.
- (3) 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;
- (4) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;
- (5) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
- (6) Application of oils, greases, lubricants or other non-volatile materials applied as temporary protective coatings;
- (7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment;
- (9) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility;
- (10) Process vessel degassing and cleaning to prepare for internal repairs;
- (11) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal;

- (12) Paved and unpaved roads and parking lots with public access;
- (13) 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;
- (14) Gasoline generators not exceeding 110 horsepower;
- (15) A laboratory as defined in 326 IAC 2-7-1(21)(C); and
- (16) Other activities or categories not previously defined:
 - (a) Two (2) 0.35 MMBtu per hour, natural gas fired power washers.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

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 13, 1996.

A notice of completeness letter was mailed to the source on January 17, 1997.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 14).

Potential Emissions

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

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

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

HAP's	Potential Emissions (tons/year)
1,1-Dichloroethylene	less than 10
1,2-Dichloroethane	less than 10
1,4 Dichlorobenzene	less than 10
2,4,5-Trichlorophenol	less than 10
2,4,6-Trichlorophenol	less than 10
2,4-Dinitrotoluene	less than 10
Arsenic	less than 10
Benzene	less than 10
Cadium	less than 10
Carbon Tetrachloride	less than 10
Chlorobenzene	less than 10
Chloroform	less than 10
Chromium	less than 10
Ethyl Benzene	less than 10
Hexochlorobenzene	less than 10
Hexachloroethane	less than 10
Lead	less than 10
m-Cresol	less than 10
Mercury	less than 10
Methanol	less than 10
MEK	less than 10
Nitrobenzene	less than 10
o-Cresol	less than 10
p-Cresol	less than 10
Pentachlorophenol	less than 10
Selenium	less than 10
Tetrachloroethylene	less than 10
Toluene	less than 10
Trichloroethylene	less than 10
Vinyl Chloride	less than 10
Xylene	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year or the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not 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 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.5
PM-10	0.5
SO ₂	8.5
VOC	13.5
CO	0.0
NO _x	0.0
HAP (specify)	0.0

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons per year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Wastewater Treatment Facility	0.00	0.00	8.60	19.50	0.00	0.00	13.00
Waste Oil Treatment Facility	0.00	0.00	2.90	10.60	0.00	0.00	0.30
Solids Processing	0.00	0.00	0.00	4.10	0.00	0.00	6.90
Bulk Storage of Secondary Fuel Products	0.00	0.00	0.00	2.52	0.00	0.00	0.08
Waste Oil Fuel Combustion	1.30	1.30	2.10	0.00	0.00	0.00	0.00
Total Emissions	1.30	1.30	13.60	36.72	0.00	0.00	20.28

* VOC emissions from wastewater treatment facility include total HAP emissions; limit based on maximum allowable VOC concentration of 100 ppm.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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

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

- (a) The bulk petroleum storage tanks, constructed in 1980, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subpart K). Each tank has a storage capacity of less than 40,000 gallons.
- (b) The wastewater treatment facility, waste oil treatment facility and solids processing facility are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63.680, Subpart DD. The plant site is not a major source of hazardous air pollutant (HAP) emissions as defined in 40 CFR 63.2.

State Rule Applicability - Entire Source

326 IAC 2-1-3.4 (New Source Toxics Control)

This source is not subject to the requirements of 326 IAC 2-1-3.4 (New Source Toxics Control). The unpermitted facilities at the source each have a PTE of less than 10 tons per year of a single HAP and less than 25 tons per year of total HAPs and each was constructed before July 27, 1997, therefore, these facilities are not subject to the requirements of 326 IAC 2-1-3.4.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 because the potential to emit of all regulated pollutants is less than 250 tons per year.

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 is located in St. Joseph County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

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

State Rule Applicability - Individual Facilities

326 IAC 6-2-1 (Particulate Matter Limitations)

The particulate matter (PM) emissions from the two (2) power washers shall be limited by the following:

- (1) The two (2) power washers, with a combined maximum heat input capacity of 0.70 MMBtu per hour, each constructed in 1989, are subject to 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation after September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{109}{Q^{0.26}}$$

$$Pt = \frac{109}{0.70^{0.26}} = 1.20 \text{ lb/MMBtu}$$

The allowable particulate emission rate from the two (2) power washers, based on the above equation, is 1.20 pounds per MMBtu heat input. However, pursuant to 326 IAC 6-2-4(a), the allowable PM emission rate from any facility which began operation after September 21, 1983, shall in no case exceed 0.6 pounds per MMBtu heat input. Therefore, the allowable PM emission rate from each of the two (2) power washers is limited to 0.6 pounds per MMBtu heat input. The two (2) power washers have a potential PM emission rate of 0.00 pounds per MMBtu heat input, therefore, they will comply with 326 IAC 6-2-3 (see Appendix A, page 1 of 14, for detailed compliance calculations).

The two (2) space heaters are not subject to 326 IAC 6-2-1 (Particulate Matter Limitations). The two (2) space heaters are not indirect heating facilities.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This source is not subject to 326 IAC 7-1 (Sulfur Dioxide Emission Limitations). The SO₂ emitted from the Wastewater Treatment Process and the Waste Oil Treatment Process is not from a fuel combustion facility. The two (2) space heaters emit less than 10 pounds per hour of SO₂, therefore, is also not subject to this rule.

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

The Wastewater Treatment Process is not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because the facility will limit VOC emissions to less than 25 tons per year. All other facilities at the source have potential to emit of VOC of less than 25 tons per year.

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

This source is not subject to 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) because the petroleum liquid storage vessels have capacities less than 39,000 gallons.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is subject to 326 IAC 8-9-1(b). This source contains stationary vessels with capacities less than 39,000 gallons. Therefore, this source is subject to 326 IAC 8-9-6(a) and (b) (Record Keeping and Reporting Requirements).

- (a) The owner or operator of each vessel subject to this rule shall keep all records required for three (3) years unless specified otherwise. Records required shall be maintained for the life of the vessel.
- (b) The owner or operator of each vessel shall maintain a record and submit to the department a report containing the following information for each vessel:
 - (a) The vessel identification number;
 - (b) The vessel dimensions;
 - (c) The vessel capacity; and
 - (d) A description of the emission control equipment for each vessel or a schedule for installation of emission control equipment on each vessel with a certification that the emission control equipment meets the applicable standards.

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, OAM, 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 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 Wastewater Treatment Process has applicable compliance monitoring conditions as specified below:

- (a) Total emissions of VOC in the Wastewater Treatment Process shall not exceed 25 tons per year. This emission limit is based on RCRA limit of a maximum allowable VOC concentration of 100 ppm.
- (b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC usage for the wastewater treatment process.

These monitoring conditions are necessary to render the requirements of 326 IAC 8-1-6 (BACT) not applicable and to ensure compliance with 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 2 through 14).

Conclusion

The operation of this petroleum and coal products operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T141-7673-00166**.

**Indiana Department of Environmental Management
Office of Air Management
and
St. Joseph County Health Department**

Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Safety & Environmental Resources, Inc.
Source Location:	1122 Division Street, Mishawaka, IN 46545
County:	St. Joseph
SIC Code:	2999
Operation Permit No.:	T141-7673-00166
Permit Reviewer:	Yvette de los Angeles/EVP

On September 29, 1998, the Office of Air Management (OAM) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Safety & Environmental Resources, Inc. had applied for a Part 70 Operating Permit for the operation of a petroleum and coal products operation. The notice also stated that OAM proposed to issue a permit for this installation 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 thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 29, 1998, Kevin A. Parks submitted comments on the proposed Part 70 permit, on behalf of Safety & Environmental Resources, Inc.. The summary of the comments and corresponding responses are as follows:

Comment:

On September 1, 1998, Safety & Environmental Resources, Inc. ceased the operation of the wastewater treatment facility. Safety & Environmental Resources, Inc. will however, continue to operate all other facilities, and will continue to accept wastewater. The wastewater will be transferred to another site (not owned by Safety & Environmental Resources, Inc.) for treatment and disposal. Safety & Environmental Resources, Inc. is requesting that the wastewater treatment facility be changed to a wastewater storage/transfer facility.

The wastewater treatment chemicals described in the permit application will no longer be used. The limits, however, for the volatile organic compounds in the wastewater will remain the same, due to RCRA limits. The maximum concentration of VOC will remain at 100 ppm.

The wastewater will be stored in tanks L, M, Q, R, S, and T. The limitation of wastewater acceptance for storage at the facility is 21,000 gallons per day (7,297.5 pounds per hour) and a maximum storage capacity of 47,000 gallons at any one time.

Response:

Since this facility has been removed, the potential emissions for VOC and HAP's have remained the same. There will be no SO₂ emissions. The RCRA limit of 100 ppm is still enforced, therefore, there are no changes to the applicable rules. The following changes have been made to the TSD and Part 70 Permit:

- (a) Page 1 of 9 of the TSD should read as follows:

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source consists of the following unpermitted facilities/units:

- ~~(1) One (1) wastewater treatment facility, constructed in 1989, with the capacity to process 43,000 gallons of wastewater per day (14,943 pounds per hour), exhausting through stacks F1 and F2, consisting of the following equipment:~~

- ~~(a) One (1) primary separation tank (Tank L) with a capacity of 11500 gallons;~~
~~(b) Four (4) primary treatment tanks (Tanks A, I, J, and K) with capacities of 7500, 11500, 11500, and 12500, respectively;~~
~~(c) Two (2) secondary treatment tanks (Tanks O and T) with capacities of 18200 and 7500 gallons, respectively;~~
~~(d) Two (2) flocculation tanks (Tanks B and G) with capacities of 10135 and 4000 gallons, respectively; and~~
~~(e) One (1) activated carbon system with a capacity of 10,065 pounds per hour;~~

- (1) One (1) wastewater storage/transfer facility, constructed in 1998, with the maximum capacity to store 47,000 gallons of wastewater, consisting of the following equipment:**

- (a) Six (6) wastewater storage tanks (Tanks L, M, Q, R, S, and T) with capacities of 11500, 5500, 7500, 7500, 7500, and 7500 gallons, respectively;**

- (2) One (1) waste oil treatment facility, constructed in 1989, with a capacity to process 362 gallons of oil per hour (3016 pounds per hour), exhausting through stacks F1 and F2, consisting of the following equipment:**

- ~~(a) Eighteen (18) storage tanks (Tanks C, D, E, F, P, 101, 102, 104-110, 112, 3, and 4) with capacities ranging between 500 - 20100 gallons; and~~
~~(b) Six (6) waste oil treatment tanks (Tanks H, M, N, Q, R, and S) with capacities of 5000, 5500, 5500, 7500, 7500, and 7500 gallons, respectively;~~

- (a) Nineteen (19) storage tanks (Tanks 3, 5, 6, 7, 8, 9, 10, 11, 12, C, D, E, F, O, P, T3, T4, 1, and 2) with capacities ranging between 500-20100 gallons; and**
(b) Seven (7) waste oil treatment tanks (Tanks A, B, G, H, I, J, and K) with capacities of 7500, 10000, 4000, 5000, 11500, 11500, and 12500 gallons respectively;

- (3) One (1) solids processing facility, constructed in 1995, with a capacity to process 3 pounds per hour of materials from the waste oil treatment facility and 500 pounds per hour from petroleum contaminated soils , exhausting through stack F3; and
- (4) One (1) bulk petroleum storage facility, **containing the following tanks:**
 - (a) Five (5) tanks for mineral spirits (Tanks **M1-M5**) with capacities of 1750, 1750, 1750, 1750 and 2750 gallons, **respectively;**
 - (b) Three (3) tanks for diesel fuel storage (Tanks ~~403, 4, and 2~~ **4, T1 and T2**) with capacities of 20100, 10500 and 1000 gallons, **respectively; and**
 - (c) **One (1) diesel fuel storage boiler (Tank N) with a capacity of 5500 gallons.**
- (b) The above changes were made to the Part 70 Permit (Condition A.2 and the Facility Description - Condition D).
- (c) The space heating has been removed from the source. The "Insignificant Activities", page 2 of 9, of the TSD should read as follows:

Insignificant Activities

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

- (2) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing containing less than five-tenths (0.5) percent sulfur by weight;
 - ~~(a) Two (2) space heaters, each installed in 1992, utilizing a heat input rate of 0.5 and 0.4 million British thermal units (MMBtu) per hour, each combusting waste oil fuel, each exhausting to stacks H1 and H2, respectively.~~
- (d) Emission calculations have been changed. The "Emission Calculations", page 3 of 9, of the TSD should read as follows:

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through ~~4~~ **13**).

- (e) The "Limited Potential to Emit" , page 5 of 9, of the TSD should read as follows:

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons per year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Wastewater Treatment Facility Wastewater Storage/Transfer Facility	0.00	0.00	8.60 0.00	49.50 6.39	0.00	0.00	43.00 3.20
Waste Oil Treatment Facility	0.00	0.00	2.90 4.40	40.60 10.80	0.00	0.00	0.30 1.30
Solids Processing	0.00	0.00	0.00	4.10	0.00	0.00	6.90
Bulk Storage of Secondary Fuel Products	0.00	0.00	0.00	2.52 3.12	0.00	0.00	0.08 0.12
Waste Oil Fuel Combustion	4.30	4.30	2.10	0.00	0.00	0.00	0.00
Total Emissions	4.30 0.00	4.30 0.00	10.60 4.40	96.72 24.41	0.00	0.00	20.28 11.52

* VOC emissions from wastewater treatment facility include total HAP emissions; limit based on maximum allowable VOC concentration of 100 ppm.

- (f) The "State Rule Applicability - Individual Facilities", page 7 of 9, of the TSD should read as follows:

State Rule Applicability - Individual Facilities

326 IAC 6-2-1 (Particulate Matter Limitations)

~~The two (2) space heaters are not subject to 326 IAC 6-2-1 (Particulate Matter Limitations). The two (2) space heaters are not indirect heating facilities.~~

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This source is not subject to 326 IAC 7-1 (Sulfur Dioxide Emission Limitations). The SO₂ emitted from the ~~Wastewater Treatment Process~~ and the Waste Oil Treatment Process is not from a fuel combustion facility. ~~The two (2) space heaters emit less than 10 pounds per hour of SO₂, therefore, is also not subject to this rule.~~

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

The Wastewater ~~Treatment Process~~ **Storage/Transfer Facility** is not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because the facility will limit VOC emissions to less than 25 tons per year. ~~All other facilities at the source~~ **The waste oil treatment, solids processing, and bulk storage operations** have potential to emit of VOC of less than 25 tons per year.

(g) The "Compliance Requirements", page 8 of 9, of the TSD should read as follows:

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, OAM, 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 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 Wastewater ~~Treatment Process~~ **Storage/Transfer Facility** has applicable compliance monitoring conditions as specified below:
 - (a) Total emissions of VOC in the Wastewater Treatment Process shall not exceed 25 tons per year. This emission limit is based on RCRA limit of a maximum allowable VOC concentration of 100 ppm.
 - (b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC usage for the wastewater treatment process.

These monitoring conditions are necessary to render the requirements of 326 IAC 8-1-6 (BACT) not applicable and to ensure compliance with 326 IAC 2-7 (Part 70).

(h) The "Air Toxics Emissions", page 9 of 9, of the TSD should read as follows:

Air Toxic Emissions

- (b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 2 through ~~11~~ **13**).
- (i) Section D.1.1 of the Part 70 Permit has been changed as follows:

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

D.1.1 VOC Limitation [326 IAC 8-1-6]

Total VOC usage in the wastewater ~~treatment process~~ **storage/transfer facility** shall be limited such that associated VOC emissions are less than 25 tons per twelve (12) consecutive month period. ~~This is equivalent to maximum VOC emission of 66.67 gallons per year and VOC content of 42.5%. Transportation limitations limit influent wastewater storage to 21,000 gallons per day.~~

This is equivalent to VOC emissions of 6.39 tons per year. Compliance with this limit makes 326 IAC 8-1-6 (BACT) not applicable.

(j) Section D.1.5 of the Part 70 Permit has been changed as follows:

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1). Records maintained for (1) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) For the wastewater ~~treatment process~~ **storage/transfer facility**, the volume usage and VOC content of each material used shall be recorded on a daily basis.
- (k) Under Quarterly Reporting, the facility name has been changed from Wastewater Treatment Facility to Wastewater Storage/Transfer Facility.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit and Technical Support Document (changes in bold or strikeout for emphasis):

Comment 1

This source operates a Gencor Hy-Way boiler capable of firing on waste oil, #2 distillate oil, or natural gas. This unit was firing on #2 oil during a compliance inspection conducted on April 9, 1998. Please add this unit and its associated limits and record keeping requirements to this permit.

Response 1

(a) Page 2 of 9 in the Technical Support Document has been modified as follows:

Insignificant Activities

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

- (2) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing containing less than five-tenths (0.5) percent sulfur by weight;
- (a) **One (1) boiler, installed in 1997, utilizing a heat input rate of 2.0 MMBtu per hour, combusting No. 2 distillate fuel oil, exhausting to stack B1.**
- (b) The following changes have been made and incorporated into the Part 70 permit (Condition A.3):

A.3 Specifically Regulated 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)

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

(2) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing containing less than five-tenths (0.5) percent sulfur by weight;

(a) One (1) boiler, installed in 1997, utilizing a heat input rate of 2.0 MMBtu per hour, combusting No. 2 distillate fuel oil, exhausting to stack B1.

(c) Condition D.2 has been added and reads as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(1) Two (2) 0.35 MMBtu per hour, natural gas fired power washers.

(2) One (1) boiler, installed in 1997, utilizing a heat input rate of 2.0 MMBtu per hour, combusting No. 2 distillate fuel oil, exhausting to stack B1.

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

D.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 0.70 MMBtu per hour heat input power washers and the 2.0 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

(d) The "State Rule Applicability - Individual Facilities" page 7 of 9, of the TSD has been revised further as follows:

State Rule Applicability - Individual Facilities

326 IAC 6-2-1 (Particulate Matter Limitations)

The particulate matter (PM) emissions from the two (2) power washers **and one (1) boiler** shall be limited by the following:

(a) The two (2) power washers, with a combined maximum heat input capacity of 0.70 MMBtu per hour, each constructed in 1989, are subject to 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation after September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{109}{Q^{0.26}}$$

$$Pt = \frac{109}{0.70^{0.26}} = 1.20 \text{ lb/MMBtu}$$

The allowable particulate emission rate from the two (2) power washers, based on the above equation, is 1.20 pounds per MMBtu heat input. However, pursuant to 326 IAC 6-2-4(a), the allowable PM emission rate from any facility which began operation after September 21, 1983, shall in no case exceed 0.6 pounds per MMBtu heat input. Therefore, the allowable PM emission rate from each of the two (2) power washers is limited to 0.6 pounds per MMBtu heat input. The two (2) power washers have a potential PM emission rate of ~~0.00~~ **0.01** pounds per MMBtu heat input, therefore, they will comply with 326 IAC 6-2-3 (see Appendix A, page ~~4 of 14~~, **13 of 13** for detailed compliance calculations).

- (b) The one (1) boiler, with a maximum heat input capacity of 2.0 MMBtu per hour, constructed in 1997, is subject to 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation after September 21, 1983, shall be limited by the following equation:**

$$Pt = \frac{109}{Q^{0.26}}$$

$$Pt = \frac{109}{2.0^{0.26}} = 1.20 \text{ lb/MMBtu}$$

The allowable particulate emission rate from the boiler, based on the above equation, is 1.20 pounds per MMBtu heat input. However, pursuant to 326 IAC 6-2-4(a), the allowable PM emission rate from any facility which began operation after September 21, 1983, shall in no case exceed 0.6 pounds per MMBtu heat input. Therefore, the allowable PM emission rate from boiler is limited to 0.6 pounds per MMBtu heat input. The boiler has a potential PM emission rate of 0.01 pounds per MMBtu heat input, therefore, they will comply with 326 IAC 6-2-3 (see Appendix A, page 13 of 13 for detailed compliance calculations).

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This source is not subject to 326 IAC 7-1 (Sulfur Dioxide Emission Limitations). The SO₂ emitted from the ~~Wastewater Treatment Process and the Waste Oil Treatment Process~~ is not from a fuel combustion facility. ~~The two (2) space heaters emit less than 10 pounds per hour of SO₂, therefore, is also not subject to this rule.~~ **The boiler emits less than 10 pounds per hour of SO₂, therefore, is also not subject to this rule.**

Comment 2

IDEM is removing this provision from the permit. IDEM now believes that it is not necessary to include this condition in the permit. The issues regarding credible evidence can be adequately addressed when a showing of compliance or noncompliance is made. Indiana's air pollution control laws allow the use of any credible evidence in determining compliance or noncompliance. An explicit statement is not required in the permit. Although the permit may set out specific methods to determine compliance, any other method or other credible evidence may be admissible to demonstrate compliance or noncompliance.

~~B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

Response 2

Condition B.28 has been removed.

Comment 3

- (a) Condition C.2 has been revised to reflect current rule language. The condition has been changed to:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions Opacity~~ shall not exceed an average of thirty percent (30%) ~~opacity~~ in ~~twenty four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions Opacity~~ shall not exceed sixty percent (60%) ~~opacity~~ 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.
- (b) Page 7 of 9, of the Technical Support Document, should read as follows:

326 IAC 5-1 (~~Visible Emissions~~ **Opacity** Limitations)

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions Opacity~~ shall not exceed an average of thirty percent (30%) ~~opacity~~ in ~~twenty four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions Opacity~~ shall not exceed sixty percent (60%) ~~opacity~~ 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.

Response 3

Condition C.2 has been changed and the TSD has been revised accordingly.

Appendix A: Emission Calculations

Company Name: Safety & Environmental Resources, Inc.
Address City IN Zip: 1122 Division Street, Mishawaka, IN 46545
Title V Permit: 141-7673
Plt ID: 141-00166
Reviewer: Yvette de los Angeles/EVP
Date: 01/11/99

Uncontrolled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Wastewater Storage/Trasfer Facility	Waste Oil Treatment	Soilds Processing	Bulk Storage of Secondary Fuel Products (tanks)	Insignificant Activities	TOTAL
PM	0.00	0.00	0.00	0.00	0.12	0.12
PM10	0.00	0.00	0.00	0.00	0.12	0.12
SO2	0.00	4.40	0.00	0.00	4.40	8.80
NOx	0.00	0.00	0.00	0.00	1.61	1.61
VOC*	36.82	10.80	4.10	3.12	0.02	54.86
CO	0.00	0.00	0.00	0.00	0.56	0.56
total HAPs	30.43	1.30	6.90	0.12	0.00	38.75
worst case single HAP	3.20	0.10	2.30	0.03	0.00	5.63
* VOC emissions from wastewater process include total HAP emissions.						
See attached spreadsheets from source for full calculations.						
Total emissions based on rated capacity at 8,760 hours/year.						
Controlled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Wastewater Storage/Trasfer Facility	Waste Oil Treatment	Soilds Processing	Bulk Storage of Secondary Fuel Products (tanks)	Insignificant Activities	TOTAL
PM	0.00	0.00	0.00	0.00	0.12	0.12
PM10	0.00	0.00	0.00	0.00	0.12	0.12
SO2	0.00	4.40	0.00	0.00	4.40	8.80
NOx	0.00	0.00	0.00	0.00	1.61	1.61
VOC*	6.39	10.80	4.10	3.12	0.02	24.43
CO	0.00	0.00	0.00	0.00	0.56	0.56
total HAPs	6.39	1.30	6.90	0.12	0.00	14.71
worst case single HAP	3.20	0.10	2.30	0.03	0.00	5.63
* VOC emissions from wastewater process include total HAP emissions; limit based on maximum allowable VOC concentration of 100 ppm.						
See attached spreadsheets from source for full calculations.						
Total emissions based on rated capacity at 8,760 hours/year, after control.						

Emissions Calculations
SER Oil Services, Inc.

I. Introduction:

SER Oil Services, Inc., is engaged in the storage of spent water and the blending of petroleum related materials that include solids and liquids. SER Oil Services, Inc., was re-audited on November 16, 1998, at such time, the following facilities were observed in operation:

- A. Wastewater Storage Operations
- B. Waste Oil Treatment
- C. Solids Processing of Soils Contaminated with Petroleum Products
- D. Bulk Storage of Secondary Fuel Products
- E. Parts Washing Associated with Maintenance Activities
- F. Fuel Combustion for Space Heating - Natural Gas
- G. Fuel Combustion for Heating - No. 2 Fuel
- H. Fuel Combustion for Space Heating - Waste Oil
- I. Welding and Cutting Associated with Maintenance Activities
- J. Fugitive Particulate Emissions Associated with Vehicular Traffic

THIS FACILITY HAS BEEN REMOVED

For the purposes of this calculation report and the attached application, items G and I above are considered to be insignificant activities and therefore, are not quantified in this report.

II. Calculations:

- A. Wastewater Storage Operations

SEROS stores spent wastewater materials generated from various industries. The limits of influent treatment capabilities have been established by the USEPA and IDEM. RCRA limits what materials may be accepted as SEROS only stores RCRA non-hazardous and exempt materials.

Pollutants for the purposes of air emissions considerations are volatile and semi-volatile organic compounds associated with synthetic coolants and incidental materials that contact the spent

materials.

The following influent limits have been established for wastewater storage:

Parameter		Limit	Units	Type of Limit
Total VOC and SVOC Concentration		100.000	mg/L	Process
Benzene		0.500	mg/L	RCRA TCLP
Carbon Tetrachloride		0.500	mg/L	RCRA TCLP
Chlorobenzene		100.000	mg/L	RCRA TCLP
Chloroform		6.000	mg/L	RCRA TCLP
1,4-Dichlorobenzene		7.500	mg/L	RCRA TCLP
1,2-Dichloroethane		0.500	mg/L	RCRA TCLP
1,1-Dichloroethylene		0.700	mg/L	RCRA TCLP
Methyl Ethyl Ketone	#	100.000	mg/L	RCRA TCLP
Tetrachloroethylene		0.700	mg/L	RCRA TCLP
Trichloroethylene		0.500	mg/L	RCRA TCLP
Vinyl Chloride		0.200	mg/L	RCRA TCLP
o-Cresol	#-1	100.000	mg/L	RCRA TCLP
m-Cresol	#-1	100.000	mg/L	RCRA TCLP
p-Cresol	#-1	100.000	mg/L	RCRA TCLP
Total Cresols	#-1	100.000	mg/L	RCRA TCLP
2,4-Dinitrotoluene		0.130	mg/L	RCRA TCLP
Hexachlorobenzene		0.130	mg/L	RCRA TCLP
Hexachloro-1,3-butadiene		0.500	mg/L	RCRA TCLP
Hexachloroethane		3.000	mg/L	RCRA TCLP
Nitrobenzene		2.000	mg/L	RCRA TCLP
Pentachlorophenol		100.000	mg/L	RCRA TCLP
Pyridine		5.000	mg/L	RCRA TCLP
2,4,5-Trichlorophenol	#-2	100.000	mg/L	RCRA TCLP
2,4,6-Trichlorophenol		2.000	mg/L	RCRA TCLP
Arsenic		5.000	mg/L	RCRA TCLP
Barium		100.000	mg/L	RCRA TCLP
Cadmium		1.000	mg/L	RCRA TCLP
Chromium		5.000	mg/L	RCRA TCLP
Lead		5.000	mg/L	RCRA TCLP
Mercury		0.200	mg/L	RCRA TCLP
Selenium		1.000	mg/L	RCRA TCLP
Silver		5.000	mg/L	RCRA TCLP

Chlordane	#-3	0.000	mg/L	POTW Limit
Endrin	#-3	0.000	mg/L	POTW Limit
Heptachlor	#-3	0.000	mg/L	POTW Limit
Lindane	#-3	0.000	mg/L	POTW Limit
Methoxychlor	#-3	0.000	mg/L	POTW Limit
Toxaphene	#-3	0.000	mg/L	POTW Limit
2,4-D	#-3	0.000	mg/L	POTW Limit
2,4,5-TP	#-3	0.000	mg/L	POTW Limit

- Indicates where the default limit of 100 ppm applies

#-1 Actual TCLP limit = 200.00 mg/L

#-2 Actual TCLP limit = 400.00 mg/L

#-3 These chemicals are prohibited by TSCA.

SEROS has the capability to store 47,000 gallons of wastewater at any one time. Transportation limitations limit influent wastewater storage to 21,000 gallons per day. The annual pounds of wastewater throughput to this facility is calculated as:

21000 gal/day	365 day/yr	8.34 lb/gal	63926100 lb/yr
			7297.5 lb/hr

The maximum amount of each material stated above in pounds per year is derived by multiplying the maximum allowable concentration by the maximum pounds of wastewater received per year as:

Parameter	Potential Emissions (lb/yr)	tons/yr
Total VOC and SVOC Concentration	6,393	3.196
Benzene	32	0.016
Carbon Tetrachloride	32	0.016
Chlorobenzene	6,393	3.196
Chloroform	384	0.192
1,4-Dichlorobenzene	479	0.240
1,2-Dichloroethane	32	0.016
1,1-Dichloroethylene	45	0.022
Methyl Ethyl Ketone	6,393	3.196
Tetrachloroethylene	45	0.022
Trichloroethylene	32	0.016

Vinyl Chloride		13	0.006
o-Cresol		6,393	3.196
m-Cresol		6,393	3.196
p-Cresol		6,393	3.196
Total Cresols		6,393	3.196
2,4-Dinitrotoluene		8	0.004
Hexachlorobenzene		8	0.004
Hexachloro-1,3-butadiene		32	0.016
Hexachloroethane		192	0.096
Nitrobenzene		128	0.064
Pentachlorophenol		6,393	3.196
Pyridine		320	0.160
2,4,5-Trichlorophenol		6,393	3.196
2,4,6-Trichlorophenol		128	0.064
Arsenic	*	320	0.160 x
Barium	*	6,393	3.196
Cadmium	*	64	0.032
Chromium	*	320	0.160
Lead	*	320	0.160
Mercury	*	13	0.006
Selenium	*	64	0.032
Silver	*	320	0.160
Chlordane		0	0.000
Endrin		0	0.000
Heptachlor		0	0.000
Lindane		0	0.000
Methoxychlor		0	0.000
Toxaphene		0	0.000
2,4-D		0	0.000
2,4,5-TP		0	0.000
			30.431

As the maximum allowable VOC concentration is 100 ppm, no single HAP as a VOC or SVOC can be emitted in excess of this limit. For HAPs that exceed the total limit, the total limit upper threshold applies. All other HAPs are limited to their respective influent limits. The aggregate limit for VOCs and SVOCs cannot exceed the influent upper limit.

Metals are also limited to a concentration of 100.00 based upon the limitations of the treatment process.

VOC& HAPs Therefore, the potential HAP emission rate from this facility is the sum of the upper VOC/SVOC limit plus total metal sum limit (*) which equals: 6.39 tons per year.

SEROS does not accept wastestreams that contain pesticides or herbicides.

SO2 Sulfuric acid is NO LONGER used in this process.
Potential SO2 emissions are: 0 lb/Yr
0.0 TPY

B. Waste Oil Treatment

SEROS processes waste crankcase oils, UST bottoms, and spent lubricants to produce a secondary fuel. This secondary fuel is inturn sold as a fuel stock to processing operations such as asphalt manufacturers. SEROS has the capacity to process 31,000 gallons gallons of secondary fuel per year per a 72 hour period.

31000 gal/3 day x 0.84 x 8.34 lb/gal x 1 day/24 hrs = 3016.3 lb/hr
361.67 gal/hr
365 work day/1 yr x 1 tank turnover/3 work days = 122 Potential tank turn overs (N)

ASTM Method 24 Testing on the waste oil stream reveals that the waste oil contains 14.4% VOC by weight. Therefore, 14.4% is used for all processing calculations to determine VOC emissions. SW-846 Method 8020 shows an average Benzene, Ethyl Benzene, Toluene, and Xylene concentration of 10,000 mg/L each. Therefore, 1.0% of the total weight processed is assumed to be from these HAPs.

The materials processed contain high molecular weight, low vapor pressure products. Emissions losses are in the form of breathing and working losses. The materials stored in the processing tanks are heated to 180 degrees F.

The losses are calculated as:

LB = 2.26x10⁻² Mv [P/Pa-P]ex0.68 Dex1.73 Hex0.51 dTex0.50 Fp C Kc

Where: LB Breathing Loss (lb/yr)
Mv Molecular Weight of Vapor in the storage tank (lb/lb mole)
D Tank diameter in feet
H 1/2 Tank height in feet
dT Temperature difference F

Example: Tank H - Waste Oil Treatment Tank

Constant	Mv	$[P/(Pa-P)] \times 0.68$	Dex ^{1.73}	Hex ^{0.51}	dTex ^{0.50}	Fp	C	Kc
0.0226	1250	$0.5/(14.696-.05) \times 0.68$ 0.1006	8ex ^{1.73} 36.5	13.5ex ^{0.51} 3.77	110ex ^{0.50} 10.5	1	0.25	1

The loss associated with working is calculated as:

$$LW = 2.4 \times 10^{-5} \times Mv \times P \times V \times N \times Kn \times Kc$$

Constant	Mv	P	V	N	Kn	Kc	Percent VOC	Result Lb/Yr
0.000024	1250	0.5	5000	122	0.44	1	0.104	418.704

The sum of the breathing losses for all waste oil processing tanks is:

Tank	Constant	Mv	$[P/(Pa-P)] \times 0.68$	Dex ^{1.73}	Hex ^{0.51}	dTex ^{0.50}	Fp	C
H	0.0226	1250	0.1006	36.5	3.77	10.5	1	0.25
B	0.0226	1250	0.1006	73.62	2.49	10.5	1	0.25
G	0.0226	1250	0.1006	28.97	2.7	10.5	1	0.25
A	0.0226	1250	0.1006	58.43	2.44	10.5	1	0.25
I	0.0226	1250	0.1006	73.62	2.65	10.5	1	0.25
J	0.0226	1250	0.1006	73.62	2.65	10.5	1	0.25
K	0.0226	1250	0.1006	73.62	2.79	10.5	1	0.25

The sum of the working losses for all waste oil processing tanks is:

Tank	Constant	Mv	P	V	N	Kn	Kc	Percent	Result
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								VOC	Lb/Yr
H	0.000024	1250	0.5	5000	122	0.44	1	0.144	579.74
B	0.000024	1250	0.5	10135	122	0.44	1	0.144	1175.14
G	0.000024	1250	0.5	4000	122	0.44	1	0.144	463.80
A	0.000024	1250	0.5	7500	122	0.44	1	0.144	869.62
I	0.000024	1250	0.5	11500	122	0.44	1	0.144	1333.41
J	0.000024	1250	0.5	11500	122	0.44	1	0.144	1333.41
K	0.000024	1250	0.5	12500	122	0.44	1	0.144	1449.36
									7204.48

In addition to the working and breathing losses, SEROS adds treatment polymers and sulfuric acid to aid in processing. Some polymers contain VOCs that are potentially lost during processing. The emissions summary is as follows:

Material	Usage lb/hr	Percent VOC	VOC lb/hr	VOC lb/Yr	VOC lb/hr
DM-80	1.5	60.00%	0.9	7884	0.9
AS-350	1.5	40.00%	0.6	5256	0.6
				13140	1.5

VOC Total VOCs are: 21566.224 Lb/Yr
10.8 TPY

SO2 Sulfuric acid is used in this process at a rate of 1.0 lb per hour.
Potential SO2 emissions are: 8760 lb/Yr
4.4 TPY

HAPs AS-350 is the only process additive that contains a HAP; Methanol at 20%. Potential Methanol emissions are calculated as:

$$1.5 \text{ lb/hr} \times 0.20 \times 8760 = 2628 \text{ lb/Yr}$$

1.3 TPY

HAPs potentially in the waste oil treatment process include Benzene, Ethyl Benzene, Toluene, and Xylene. Each is potentially present at a concentration of 1%.

Based upon the VOC emission rate of the process, the potential emissions for these HAPs is less than 1 TPY.

Total HAPs 1.7 TPY

C. Solids Processing

SEROS processes solid materials (soils and waste oil treatment bottoms) by a solidification process. SEROS can process 3.02 lb/hr of materials from the waste oil treatment facility and 500.00 lb/hr petroleum contaminated soils with up to 1000.00 mg/Kg (ppm) petroleum contamination. From Section B, 14.4% of the waste oil treatment bottoms is VOC. Emissions are calculated as:

$$[3.02 \text{ lb/hr} \times 0.144] + [500.00 \text{ lb/hr} \times (1000.00/1000000.00)] = 0.93 \text{ lb VOC/hr} \\ 4.1 \text{ TPY}$$

It is assumed that any one of the HAPs, Benzene, Ethyl Benzene, Toluene, or Xylene could be present in the waste soils streams. Therefore, the potential for each of these HAPs is assumed to be equal to the VOC emission potential calculated as:

$$[3.02 \text{ lb/hr} \times 0.01] + [500.00 \text{ lb/hr} \times (1000.00/1000000.00)] = 0.53 \text{ lb HAP/hr} \\ 2.3 \text{ TPY HAP} \quad 4644.552$$

D. Bulk Storage of Secondary Fuel Products

The bulk storage of fuel products includes waste oil, mineral spirits and diesel fuel. Emissions are associated with working and breathing losses. AP-42 calculations were used to assess the VOC potential emissions at SEROS as:

A. Waste Oil Tanks

SEROS contains nine (9) identical tanks for waste oil storage. Eight (8) other tanks are also used. Losses are calculated as:

Breathing Losses:

Tank	Constant	Mv	[P/(Pa-P)]ex0.68	Dex1.73	Hex0.51	dTex0.50 10 deg F	Fp	C
(1)	0.0226	1250	0.1006	58.4	5.76	3.16	1	0.25
C	0.0226	1250	0.1006	36.5	2.79	3.16	1	0.25
D	0.0226	1250	0.1006	36.5	2.79	3.16	1	0.25
E	0.0226	1250	0.1006	29	3.84	3.16	1	0.25
F	0.0226	1250	0.1006	36.5	3.24	3.16	1	0.25
P	0.0226	1250	0.1006	73.6	4.78	3.16	1	0.25
O	0.0226	1250	0.1006	73.6	4.78	3.16	1	0.25
T3	0.0226	1250	0.1006	11	3.4	3.16	1	0.25
T4	0.0226	1250	0.1006	11	2.5	3.16	1	0.25

(1) - Tanks 3, and 5 through 12.

Working Losses:

Tank	Constant	Mv	P	V	N	Kn	Kc	Percent VOC	Result Lb/Yr
(1)	0.000024	1250	0.5	20100	17	0.44	1	0.144	2922.77
C	0.000024	1250	0.5	2800	17	0.44	1	0.144	45.24
D	0.000024	1250	0.5	2800	17	0.44	1	0.144	45.24
E	0.000024	1250	0.5	4000	17	0.44	1	0.144	64.63
F	0.000024	1250	0.5	3800	17	0.44	1	0.144	61.40
P	0.000024	1250	0.5	18200	17	0.44	1	0.144	294.05
O	0.000024	1250	0.5	18200	17	0.44	1	0.144	294.05
T3	0.000024	1250	0.5	1000	17	0.44	1	0.144	16.16
T4	0.000024	1250	0.5	500	17	0.44	1	0.144	8.08

B. Mineral Spirits Tanks 3751.61

SEROS has five mineral spirits tanks with losses calculated as:
Four tanks are identical.

Breathing Losses:

Tank	Constant	Mv	[P/(Pa-P)]ex0.68	Dex1.73	Hex0.51	dTex0.50 10 deg F	Fp	C
(2)	0.0226	125	0.1	19.1	3.2	3.16	1	0.25

5	0.0226	125	0.1		22.2	3.7	3.16	1	0.25
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(2) - Tanks M1 thru M4

Working Losses:

Tank	Constant	Mv	P	V	N	Kn	Kc	Percent VOC	Result Lb/Yr
(2)	0.000024	125	0.5	1750	26	0.44	1	0.144	17.30
5	0.000024	125	0.5	2750	26	0.44	1	0.144	6.80

C. Diesel Fuel Storage Tanks 24.09

SEROS contains four (4) diesel fuel storage tanks. Losses are calculated as:

Breathing Losses:

Tank	Constant	Mv	$[P/(Pa-P)] \times 0.68$	Dex1.73	Hex0.51	dTex0.50 10 deg F	Fp	C
4	0.0226	75	0.28	58.4	5.76	3.16	1	0.25
N	0.0226	75	0.28	28.97	3.19	3.16	1	0.25
T1	0.0226	75	0.28	53.7	4.4	3.16	1	0.25
T2	0.0226	75	0.28	11	3.4	3.16	1	0.25

Working Losses:

Tank	Constant	Mv	P	V	N	Kn	Kc	Percent VOC	Result Lb/Yr
4	0.000024	75	2	20100	13	0.44	1	1	413.90
N	0.000024	75	2	5500	13	0.44	1	1	113.26
T1	0.000024	75	2	10500	13	0.44	1	1	216.22
T2	0.000024	75	2	1000	13	0.44	1	1	20.59

Total tank losses are: 763.9632

VOC	Material	Breathing	Working	Total	Total	Total
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	Loss lb/yr	Loss lb/yr	Loss Lb/Yr	Loss TPY	Loss lb/hr
Waste Oil	1367.32	3751.61	5118.93	2.56	0.58
Mineral S	72.89	24.09	96.99	0.05	0.01
No. 2	263.38	763.96	1027.35	0.51	0.12
	1703.60	4539.66	6243.26	3.12	0.71

HAPs from the waste oil are considered to be 1% of the total emission rate. Mineral Spirits does not contain HAPs. HAPs associated with diesel fuel are considered to be insignificant.

HAPs			
Benzene		0.01 Lb/Hr	0.03 TPY
Ethyl Benzene		0.01 Lb/Hr	0.03 TPY
Toluene		0.01 Lb/Hr	0.03 TPY
Xylene		0.01 Lb/Hr	0.03 TPY

E. Parts Washing Associated with Maintenance Activities

SEROS has two (2) parts washers that consume 10 gallons of low vapor pressure mineral spirits every 30 days.

$$10 \text{ gal}/30 \text{ days} \times 0.8 \times 8.34 \text{ lb/gal} \times 1 \text{ day}/24 \text{ hrs} = \begin{matrix} 0.1 \text{ lb VOC/hr} \\ 2.2 \text{ lb VOC/day} \\ 0.4 \text{ TPY} \end{matrix}$$

No HAPs are associated with this activity and it has been considered to be insignificant.

F. Fuel Combustion for Space Heating - Natural Gas

This activity is considered to be insignificant.

G. Fuel Combustion for Heating - No. 2 Fuel

The wastewater and waste oil treatment processes utilize a single 2.0MM BTU/hr process boiler that consumes diesel fuel as the primary fuel source. The percent sulfur is less than 0.5%.

Therefore, this source is considered to be insignificant.

H. Fuel Combustion for Space Heating - Waste Oil

THIS FACILITY NO LONGER EXISTS.

SEROS has two (2) waste oil fired space heaters as:

Unit ID	MM BTU/hr Input
H1	0
H2	0

0.9 MM BTU/hr / 0.105 MM BTU/gal =	0 gal/hr
6.7 gal/hr x 8760 hr/yr =	0 gal/yr
58692 gal/yr x 0.84 x 8.34 lb/gal =	0 lb/yr

Parameter	Weight %	Emissions lb/yr	Emissions TPY	Emissions lb/hr
SO2	Weight Percent Sulfur = 0.80% Percent	0.0000	0.0000	0.0000
PM10	Weight Percent Ash = 0.48% Percent	0.0000	0.0000	0.0000
HAP	Weight Percent Lead = 0.0016% Percent	0.0000	0.0000	0.0000
HAP	Weight Percent Arsenic = 0.0002% Percent	0.0000	0.0000	0.0000
HAP	Weight Percent Cadmium = 0.0001% Percent	0.0000	0.0000	0.0000
HAP	Weight Percent Chromium = 0.0002% Percent	0.0000	0.0000	0.0000

Carbon Monoxide & HAP emissions are considered to be insignificant.

I. Welding and Cutting Associated with Maintenance Activities

Welding and cutting are associated with vehicle maintenance activities and are considered to be insignificant.

J. Fugitive Particulate Emissions Associated with Vehicular Traffic

Fugitive particulate emissions associated with vehicular traffic is considered to be insignificant.

III. Emissions Summary

A. Priority Pollutants

The following table summarizes the emissions at the SEROS source:

Calc ID	Facility Description	Pollutant	Emissions lb/hr	Emissions lb/Yr	Emissions TPY
A	Wastewater Storage	VOC	0.73	6393	3.2
A	Wastewater Storage	SO2	0.00	0	0.0
B	Waste Oil Treatment	VOC	2.46	21566	10.8
B	Waste Oil Treatment	SO2	1.00	8760	4.4
C	Solids Processing	VOC	0.93	8190	4.1
D	Petroleum Storage	VOC	0.71	6243	3.1
E	Parts Washers	VOC	INSIGNIFICANT		
F	Nat Gas Combustion	Priority	INSIGNIFICANT		
G	Fuel Oil Combustion	Priority	INSIGNIFICANT		
H	Waste Oil Combustion	SO2	0.00	0	0.0
H	Waste Oil Combustion	PM10	0.00	0	0.0
I	Welding/Cutting	Priority	INSIGNIFICANT		
J	Vehicular Traffic	Priority	INSIGNIFICANT		
	SUMMARY	VOCs	4.84	42392	21.2
		SO2	1.00	8760	4.4
		PM10	0.00	0	0.0

B. Hazardous Air Pollutants

The following table summarizes the emissions at the SEROS source:

Calc ID	Facility Description	Pollutant	Emissions lb/hr	Emissions lb/Yr	Emissions TPY	Individual HAP Potential
A	Wastewater Storage	1,1-Dichloroethylene	0.0105	92	0.0	0.0
A	Wastewater Storage	1,2-Dichloroethane	0.0075	66	0.0	0.0

A	Wastewater Storage	1,4-Dichlorobenzene	0.1121	982	0.5	0.5
A	Wastewater Storage	2,4,5-Trichlorophenol	1.4943	13090	6.5	6.5
A	Wastewater Storage	2,4,6-Trichlorophenol	0.0299	262	0.1	0.1
A	Wastewater Storage	2,4-Dinitrotoluene	0.0021	18	0.0	0.0
H	Waste Oil Combustion	Arsenic	0.0000	0	0.0	
A	Wastewater Storage	Arsenic	0.0747	654	0.3	0.3
A	Wastewater Storage	Barium	1.4943	13090	6.5	6.5
D	Petroleum Storage	Benzene	0.0046	40	0.0	
C	Solids Processing	Benzene	0.5300	4643	2.3	
B	Waste Oil Treatment	Benzene	0.0228	200	0.1	
A	Wastewater Storage	Benzene	0.0075	66	0.0	2.5
H	Waste Oil Combustion	Cadmium	0.0000	0	0.0	
A	Wastewater Storage	Cadmium	0.0148	130	0.1	0.1
A	Wastewater Storage	Carbon Tetrachloride	0.0075	66	0.0	0.0
A	Wastewater Storage	Chlorobenzene	1.4943	13090	6.5	6.5
A	Wastewater Storage	Chloroform	0.0897	786	0.4	0.4
H	Waste Oil Combustion	Chromium	0.0000	0	0.0	
A	Wastewater Storage	Chromium	0.0747	654	0.3	0.3
D	Petroleum Storage	Ethyl Benzene	0.0046	40	0.0	
C	Solids Processing	Ethyl Benzene	0.5300	4643	2.3	
B	Waste Oil Treatment	Ethyl Benzene	0.0228	200	0.1	2.4
A	Wastewater Storage	Hexachloro-1,3-butidi	0.0075	66	0.0	0.0
A	Wastewater Storage	Hexachlorobenzene	0.0021	18	0.0	0.0
A	Wastewater Storage	Hexachloroethane	0.0447	392	0.2	0.2

H	Waste Oil Combustion	Lead	0.0002	2	0.0	
A	Wastewater Storage	Lead	0.0747	654	0.3	0.3
A	Wastewater Storage	m-Cresol	1.4943	13090	6.5	6.5
A	Wastewater Storage	Mercury	0.0030	26	0.0	0.0
B	Waste Oil Treatment	Methanol	0.2968	2600	1.3	1.3
A	Wastewater Storage	Methyl Ethyl Ketone	1.4943	13090	6.5	6.5
A	Wastewater Storage	Nitrobenzene	0.0299	262	0.1	0.1
G	Fuel Oil Combustion	None	0.0000	0	0.0	
F	Nat Gas Combustion	None	0.0000	0	0.0	
E	Parts Washers	None	0.0000	0	0.0	
J	Vehicular Traffic	None	0.0000	0	0.0	
I	Welding/Cutting	None	0.0000	0	0.0	0.0
A	Wastewater Storage	o-Cresol	1.4943	13090	6.5	6.5
A	Wastewater Storage	p-Cresol	1.4943	13090	6.5	6.5
A	Wastewater Storage	Pentachlorophenol	1.4943	13090	6.5	6.5
A	Wastewater Storage	Pyridine	0.0747	654	0.3	0.3
A	Wastewater Storage	Selenium	0.0148	130	0.1	0.1
A	Wastewater Storage	Silver	0.0747	654	0.3	0.3
A	Wastewater Storage	Tetrachloroethylene	0.0105	92	0.0	0.0
D	Petroleum Storage	Toluene	0.0046	40	0.0	
C	Solids Processing	Toluene	0.5300	4643	2.3	
B	Waste Oil Treatment	Toluene	0.0228	200	0.1	2.4
A	Wastewater Storage	Total Cresols	1.4943	13090	6.5	6.5
A	Wastewater Storage	Total HAPs Limit	2.9863	26160	13.1	13.1

A	Wastewater Storage	Trichloroethylene	0.0075	66	0.0	0.0
A	Wastewater Storage	Vinyl Chloride	0.0030	26	0.0	0.0
D	Petroleum Storage	Xylene	0.0046	40	0.0	
C	Solids Processing	Xylene	0.5300	4643	2.3	
B	Waste Oil Treatment	Xylene	0.0228	200	0.1	2.4

Kc	Percent VOC	Result Lb/Yr	Result Lb/Hr
1	0.144	978.78	0.11
1	0.144	32.92	0.00
1	0.144	32.92	0.00
1	0.144	36.00	0.00
1	0.144	38.23	0.00
1	0.144	113.74	0.01
1	0.144	113.74	0.01
1	0.144	12.09	0.00
1	0.144	8.89	0.00
		1367.32	0.16

Result
Lb/Hr

0.33
0.01
0.01
0.01
0.01
0.03
0.03
0.00
0.00

0.43

Kc	Percent VOC	Result Lb/Yr	Result Lb/Hr
1	100%	54.56	0.01

1	100%	18.33	0.00
		72.89	0.01

Result
Lb/Hr

0.00		
0.00	0.0027503	0.0027503
0.00		

Kc	Percent VOC	Result Lb/Yr	Result Lb/Hr
1	1	126.12	0.01
1	1	34.65	0.00
1	1	88.59	0.01
1	1	14.02	0.00
		263.383	0.0300666

Result
Lb/Hr

0.05
0.01
0.02
0.00

0.0872104

**Appendix A: Emissions Calculations
INSIGNIFICANT ACTIVITIES**

Company Name: Safety & Environmental Resources, Inc.
Address City IN Zip: 1122 Division Street, Mishawaka, IN 46545
Title V Permit: 141-7673
Plt ID: 141-00166
Reviewer: Yvette de los Angeles/EVP
Date: 01/11/99

BOILER - No.2 Fuel Oil

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.5%
2.0	125.14	

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
2.0	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.1	4.4	1.3	0.0	0.3

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu
 Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-03-005-01/02/03)
 Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

POWER WASHER - Natural Gas

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.7	6.1

Heat Input Capacity includes:
 [LIST ALL UNITS AND THEIR CAPACITIES]

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
7.6	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.02	0.02	0.00	0.31	0.02	0.26

Methodology:

MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32
 All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Compliance with 326 IAC 6-2-4

Boiler

The following calculation demonstrates compliance with the allowable PM emission limit of 0.6 lb/MMBtu pursuant to 326 IAC 6-2-4:
 maximum heat input capacity 5.00 MM Btu per hour
PM emissions 0.01 pound per MM Btu WILL COMPLY

Power Washers

The following calculation demonstrates compliance with the allowable PM emission limit of 0.6 lb/MMBtu pursuant to 326 IAC 6-2-4:
 maximum heat input capacity 0.70 MM Btu per hour
PM emissions 0.01 pound per MM Btu WILL COMPLY

Methodology

PM emissions = [(PM emission from fuel) * 2000 lb/ton] / [8760 hours * maximum heat input capacity]