

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Bulk Intermodal Distribution Services, Inc.
1401 West 145th Street
East Chicago, Indiana 46312**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F089-7702-00364	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary bulk liquid and solid material transfer source.

Responsible Official: Tom Rich
Source Address: 1401 West 145th Street, East Chicago, Indiana 46312
Mailing Address: P. O. Box 658, East Chicago, Indiana 46312
SIC Code: 4214
County Location: Lake
County Status: Attainment for CO and Lead
Primary Nonattainment for TSP and SO₂
Moderate Nonattainment for PM-10
Severe Nonattainment for ozone
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD or Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

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

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

- (a) Transfer of HAP VOL and non-HAP VOLs with vapor pressure greater than or equal to 0.5 psia, using the submerged liquid loading method between rail tank cars and tanker trucks, utilizing a vapor balance system equipped with false domes to recover vapor expelled from the tanker trucks;
- (b) Transfer of bulk non-HAP VOLs with vapor pressure less than 0.5 psia, between rail tank cars and tanker trucks, using the splash loading method;
- (c) Transfer of bulk hydrochloric acid (no more than 37% by weight in concentration) using the submerged liquid loading method between rail tank cars and tanker trucks, utilizing a portable counter-current acid scrubber for controlling acid fumes in the vent gas during the transfer; and
- (d) Transfer of bulk solid from railcars to trucks, with a maximum transfer capacity of 1,900 tons per day, using fully enclosed conveyor systems or vacuum solid transfer systems, each equipped with a Mastervac internal filter for particulate matter control.

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

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

- (a) One (1) No. 2 diesel fuel fired boiler, rated at 2.0 million British thermal units (mmBtu) per hour, exhausting through one (1) stack, identified as Boiler Stack;

- (b) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower; and
- (c) Two (2) 500 gallon diesel oil storage tanks.

A.4 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (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 2-8-9] [326 IAC 2-8-3(h)]

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

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

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

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

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM 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, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall 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 Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

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

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(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.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from December 1 to November 30 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
- (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, 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 continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM may require to determine the compliance status of the source.

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).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

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

Facsimile No.: 317-233-5967

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

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(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, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM 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, any additional information identified as needed to process the application.

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

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

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

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

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

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

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

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

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

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

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

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

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

and

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

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

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

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

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

B.24 Construction Permit Requirement [326 IAC 2]

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

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

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

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

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

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

B.28 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 such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit volatile organic compounds (VOCs) and Nitrogen Oxides (NO_x) from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any regulated pollutant from the entire source, except volatile organic compounds (VOCs) and Nitrogen Oxides (NO_x), shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
- (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

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

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

- (a) Visible emissions shall not exceed an average of twenty percent (20%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

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

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

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

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

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

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

**C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]
[40 CFR 61, Subpart M]**

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

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

C.9 Performance Testing [326 IAC 3-2.1]

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

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

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

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

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

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

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

C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

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

All required notifications shall be submitted to:

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

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

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

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

C.15 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

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

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

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

C.18 Monitoring Data Availability

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

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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 must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 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

- (a) Transfer of HAP VOL and non-HAP VOLs with vapor pressure greater than or equal to 0.5 psia, using the submerged liquid loading method between rail tank cars and tanker trucks, utilizing a vapor balance system equipped with false domes to recover vapor expelled from the tanker trucks;
- (b) Transfer of bulk non-HAP VOLs with vapor pressure less than 0.5 psia, between rail tank cars and tanker trucks, using the splash loading method; and
- (c) Transfer of bulk hydrochloric acid (no more than 37% by weight in concentration) using the submerged liquid loading method between rail tank cars and tanker trucks, utilizing a portable counter-current acid scrubber for controlling acid fumes in the vent gas during the transfer.

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

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

The Permittee shall limit the amount of bulk liquid materials to be transferred, as follows:

- (a) Non-HAP Volatile Organic Liquid (VOL)
 - (1) 1,050,000 gallons per month of non-HAP VOL with a vapor pressure (at 78°F) equal to or less than 1.5 psia and greater than 0.5 psia;
 - (2) 1,050,000 gallons per month of non-HAP VOL with a vapor pressure (at 78°F) equal to or less than 0.5 psia; and
 - (3) 1,050,000 gallons per month of non-HAP VOL with a vapor pressure (at 78°F) equal to or less than 0.05 psia.
- (b) HAP VOL
 - (1) 1,500,000 gallons per month of HAP VOL with a vapor pressure (at 78°F) equal to or less than 2.8 psia and greater than 2.0 psia;
 - (2) 2,000,000 gallons per month of HAP VOL with a vapor pressure (at 78°F) equal to or less than 2.0 psia and greater than 1.0 psia; and
 - (3) 1,725,000 gallons per month of HAP VOL with a vapor pressure (at 78°F) equal to or less than 1.0 psia.
- (c) Hydrochloric Acid
 - (1) 5,413,333 gallons per month of hydrochloric acid (no more than 50% by weight in concentration) with a vapor pressure (at 78°F) equal to or less than 1.48 psia.

These requirements shall limit the source wide VOC emissions to 2.0 tons per month, worst case single HAP emissions shall be limited to less than 0.78 tons per month and total HAPs emissions shall be limited to less than 2.0 tons per month. Therefore the source satisfies the requirements of 326 IAC 2-8 (FESOP) and is not subject to the requirements of 326 IAC 2-7. These requirements shall also make 326 IAC 2-3 (Emission Offset) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 18 and 24 months after issuance of this permit, the Permittee shall perform VOC testing to confirm compliance with the control device efficiencies specified in Condition D.1.4. The performance tests shall be conducted in accordance with Section C - Performance Testing, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

D.1.4 Volatile Organic Compounds (VOC)

- (a) All bulk organic liquid transfers, except for low vapor materials (specifically oil), must utilize a vapor balance system equipped with false domes as VOC emissions control, at all times during the transfer. The overall VOC control efficiency, including capture efficiency for the vapor balance system must be, at a minimum, 86 percent.
- (b) All bulk acid transfers must utilize a transportable counter-current packed tower wet scrubber as control, at all times during the transfer. The overall acid control efficiency, including capture efficiency, for the wet scrubber system must be, at a minimum, 86 percent.

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

D.1.5 Parametric Monitoring

The Permittee shall record the circulating water flow rates and pH values, at least once every two (2) hours when the acid transfer is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the water flow rate shall be maintained within the range of 10 to 15 gallons per minute and pH value must be greater than 0.9 or ranges of flow rate and pH value established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned ranges for any one reading.

The instrument used for determining the water flow rate and pH value shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every day.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 (c), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the limits of bulk liquid transfer limits established in Condition D.1.1 (c).
 - (1) The amount and the type of liquid transferred;
 - (2) Vapor pressure at 78°F for the liquid transferred;
 - (3) A log of the dates of liquid transfer;
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain a log of flow rates and pH values recorded every two (2) hours, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 (c) 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

- (d) Transfer of bulk solid from railcars to trucks, with a maximum transfer capacity of 1,900 tons per day, using fully enclosed conveyor systems or vacuum solid transfer systems, each equipped with a Mastervac internal filter for particulate matter control.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the following particulate matter emission limitations apply:

- (a) Average instantaneous opacity of fugitive particulate emissions from paved and unpaved roads, parking lots, and from material transfer shall not exceed ten percent (10%) opacity;
- (b) A zero(0) percent frequency of visible emissions of materials during the inplant transportation of a material by truck or rail at any time;
- (c) Opacity of particulate emissions from dust handling equipment (i.e., equipment used to handle dust collected by control equipment) shall not exceed 10 percent opacity; and
- (d) Opacity of any facility or operation not specifically listed in 326 IAC 6-1-11.1 shall meet a 20 percent, three minute opacity standard.

Compliance Determination Requirements

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

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

D.2.3 Particulate Matter (PM)

The baghouses for the enclosed conveyor systems and the filters for the vacuum transfer systems for PM control shall be in operation at all times when the bulk solid transfer are in operation and exhausting to the outside atmosphere.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the enclosed conveyor system and the vacuum transfer system exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.5 Baghouse and Filter Inspections

An inspection shall be performed each calendar quarter of all bags and filters controlling the bulk solid transfer operation when venting to the atmosphere. A baghouse or filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags or filters shall be replaced.

D.2.6 Broken Bag/Filter or Failure Detection

In the event that bag or filter failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse and filter stack exhausts.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

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

Source Name: Bulk Intermodal Distribution Services, Inc.
Source Address: 1401 West 145th Street, East Chicago, Indiana 46312
Mailing Address: P. O. Box 658, East Chicago, Indiana 46312
FESOP No.: F089-7702-00364

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Bulk Intermodal Distribution Services, Inc.
Source Address: 1401 West 145th Street, East Chicago, Indiana 46312
Mailing Address: P. O. Box 658, East Chicago, Indiana 46312
FESOP No.: F089-7702-00364

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe 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)
CThe Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Bulk Intermodal Distribution Services, Inc.
 Source Address: 1401 West 145th Street, East Chicago, Indiana 46312
 Mailing Address: P. O. Box 658, East Chicago, Indiana 46312
 FESOP No.: F089-7702-00364
 Facility: Bulk Liquid Transfer
 Parameter: Gallons Transferred per Month

Limit:

Liquid Type	VP Range (psia @ 78°F)	1000 Gal. per Month	Liquid Type	VP Range (psia @ 78°F)	1000 Gal. per Month
Non-HAP VOL	> 0.5 & #1.5	1,050	HAP VOL	> 2.0 & # 2.8	1,500
Non-HAP VOL	# 0.5	1,050	HAP VOL	> 1.0 & # 2.0	2,000
Non-HAP VOL	# 0.05	1,050	HAP VOL	# 1.0	1,725
			Hydrochloric Acid	# 2.0	5,413

YEAR: _____

Type of Liquid	VP Range (psia @ 78°F)	Amount Transferred (1000 Gal. per Month)		
		Month 1	Month 2	Month 3
Non-HAP VOL	> 0.5 & #1.5			
Non-HAP VOL	# 0.5			
Non-HAP VOL	# 0.05			
HAP VOL	> 2.0 & # 2.8			
HAP VOL	> 1.0 & # 2.0			
HAP VOL	# 1.0			
Hydrochloric Acid	# 2.0			

- 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**

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

Source Name: Bulk Intermodal Distribution Services, Inc.
 Source Address: 1401 West 145th Street, East Chicago, Indiana 46312
 Mailing Address: P. O. Box 658, East Chicago, Indiana 46312
 FESOP No.: F089-7702-00364

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

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

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

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

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Enhanced New Source Review

Source Background And Description

Source Name: Bulk Intermodal Distribution Services, Inc.
Source Location: 1401 West 145th St., East Chicago, IN 46312
County: Lake
SIC Code: 4214
Operation Permit No.: F089-7702-00364
Permit Reviewer: Scott Pan/EVP

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Bulk Intermodal Distribution Services, Inc. relating to the operation of a bulk liquid and solid material transfer source.

Permitted Emission Units and Pollution Control Equipment

The source has no permitted emission units and pollution control devices.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities:

- (a) Transfer of bulk organic liquids using the submerged liquid loading method from 25,000 gallon railcars to tank trucks, utilizing a vapor balance system equipped with false domes to recover vapor expelled from the tank trucks;
- (b) Transfer of bulk oil using the submerged liquid loading method from 25,000 gallon railcars to tank trucks;
- (c) Transfer of bulk hydrochloric acid (no more than 50% by weight in concentration) using the submerged liquid loading method from 25,000 gallon railcars to tank trucks, utilizing a transportable counter-current packed tower scrubber for controlling acid fumes in the vent gas during the transfer; and
- (d) Transfer of bulk solid from 95 ton railcars to trucks using:
 - (1) three (3) fully enclosed conveyor systems each equipped with a baghouse for particulate matter control; or
 - (2) two (2) vacuum solid transfer systems, each equipped with a Mastervac internal filter for particulate matter control.

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

The application includes information relating to the construction and operation of operation of a bulk liquid and solid material transfer source, consisting of all the unpermitted equipment listed above. There are no new emission units at this source during this review.

Insignificant Activities

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

- (a) One (1) No. 2 diesel fuel fired boiler, rated at 2.0 million British thermal units (mmBtu) per hour, exhausting through one (1) stack, identified as Boiler Stack;
- (b) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower; and
- (c) Two (2) 500 gallon diesel oil storage tanks.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
 - (1) Transfer of bulk organic liquids using the submerged liquid loading method from 25,000 gallon railcars to tank trucks, utilizing a vapor balance system equipped with false domes to recover vapor expelled from the tank trucks;
 - (2) Transfer of bulk oil using the submerged liquid loading method from 25,000 gallon railcars to tank trucks;
 - (3) Transfer of bulk hydrochloric acid (no more than 50% by weight in concentration) using the submerged liquid loading method from 25,000 gallon railcars to tank trucks, utilizing a transportable counter-current packed tower scrubber for controlling acid fumes in the vent gas during the transfer; and
 - (4) Transfer of bulk solid from 95 ton railcars to trucks using:
 - (A) three (3) fully enclosed conveyor systems each equipped with a baghouse for particulate matter control; or
 - (B) two (2) vacuum solid transfer systems, each equipped with a Mastervac internal filter for particulate matter control.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on December 13, 1996. Additional information was received on January 12, 1998.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (4 pages).

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	33.1
PM-10	15.8
SO ₂	4.4
VOC	347.8
CO	0.3
NO _x	1.3

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

See attached spreadsheets for detailed calculations (page 1 of 4 in Appendix A).

HAP	Potential Emissions (tons/year)
Hexane	133.9
Methanol	35.5
Vinyl Toluene	83.2
Hydrochloric Acid	30.0
TOTAL	312.6

See attached spreadsheets for detailed calculations (page 1 of 4 in Appendix A).

- (a) The potential emissions (as defined in the Indiana Rule) of VOC are equal to or greater than 25 tons per year and the source is located in Lake County. Therefore, the source is subject to the provisions of 326 IAC 2-1 (Construction Permit) and 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1 and 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (d) This proposed FESOP will also satisfy the requirements of the construction permit rules.
- (e) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD and Emission Offset applicability.

Limited Potential To Emit

- (a) The source has accepted a federally enforceable limit on potential to emit VOC of 24 tons per year, consisting of:
 - (i) 24.0 tons per year for the significant activities; and
 - (ii) 0.0 tons per year for the insignificant activities.
- (b) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Bulk Liquid Transfer	0.0	0.0	0.0	24.0	0.0	0.0	7.8	22.5
Bulk Solid Transfer	2.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0
Insignificant Activities	0.1	0.1	4.4	0.0	0.3	1.3	0.0	0.0
Total Emissions	2.1	1.0	4.4	24.0	0.3	1.3	7.8	22.5

County Attainment Status

The source is located in Lake County.

Pollutant	Status
TSP	Primary nonattainment
PM-10	Moderate nonattainment
SO ₂	Primary nonattainment
NO ₂	Attainment
Ozone	Severe nonattainment
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. Lake County has been designated as severe nonattainment for ozone.

Federal Rule Applicability

326 IAC 12, (40 CFR Part 60.110b, Subpart Kb-Standards of Performance for Storage Vessels)

The two (2) 500 gallon diesel oil storage tanks are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels", because the capacities for both tanks are less than 10,600 gallons. Pursuant to 40 CFR Part 60.110b (a), the requirements of Subpart Kb do not apply.

326 IAC 12, (40 CFR Part 60.500, Subpart XX, Standards of Performance for Bulk Gasoline Terminals)

The bulk liquid and solid transfers at the source are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) "Standards of Performance for Bulk Gasoline Terminals" since the source does not load gasoline and therefore is not a bulk gasoline terminal.

326 IAC 12, (40 CFR Part 63, "National Emission Standards for Hazardous Air Pollutants")

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-3 (Emission Offset)

This source is not subject to the requirements of 326 IAC 2-3 (Emission Offset), because the source's potential to emit VOC and NO_x are limited to less than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8-4 (Federally Enforceable State Operating Permit (FESOP) Program)

The source is subject to 326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP) Program) since the potential to emit (PTE) VOC is greater than 25 tons per year. Pursuant to this rule, the source shall limit the amount of bulk liquid materials to be transferred (see detail calculations in page 2 of 4 in Appendix A), as follows:

- (a) Non-HAP Volatile Organic Liquid (VOL)
 - (1) 12,600,000 gallons per year of non-HAP VOL with a vapor pressure (at 78°F) equal to or less than 1.5 psia and greater than 0.5 psia;
 - (2) 12,600,000 gallons per year of non-HAP VOL with a vapor pressure (at 78°F) equal to or less than 0.5 psia; and
 - (3) 12,600,000 gallons per year of oil with a vapor pressure (at 78°F) equal to or less than 0.05 psia.

- (b) HAP VOL
 - (1) 20,000,000 gallons per year of HAP VOL with a vapor pressure (at 78°F) equal to or less than 2.8 psia and greater than 2.0 psia;
 - (2) 30,000,000 gallons per year of HAP VOL with a vapor pressure (at 78°F) equal to or less than 2.0 psia and greater than 1.0 psia; and

- (3) 24,000,000 gallons per year of HAP VOL with a vapor pressure (at 78°F) equal to or less than 1.0 psia.
- (c) Hydrochloric Acid
 - (1) 65,000,000 gallons per year of hydrochloric acid (no more than 50% by weight in concentration) with a vapor pressure (at 78°F) equal to or less than 1.48 psia.

By accepting the above limitations the source wide VOC emissions are limited to 24.0 tons per year, worst case single HAP emissions are limited to 7.8 tons per year and total HAPs emissions are limited to 22.5 tons per year, therefore the source satisfies the requirements of 326 IAC 2-8 (FESOP) and is not subject to the requirements of 326 IAC 2-7.

326 IAC 5-1-2 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (2) (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions for sources located in the nonattainment portion of Lake County shall meet the following limitations, unless otherwise stated in this permit:

- (a) visible emissions shall not exceed an average of twenty percent (20%) opacity in twenty-four (24) consecutive readings; and
- (b) visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes in a six (6) hour period.

State Rule Applicability - Individual Facilities

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

The source is not subject to the requirements of 326 IAC 6-1-2, because the potential particulate matter (PM) emissions from the source are less than 100 tons per year and the actual PM emissions from the source are less than 10 tons per year.

326 IAC 6-1-10.1 (Lake County PM-10 Emission Requirements)

The source is not listed in 326 IAC 6-1-10(d). Therefore, pursuant to 326 IAC 6-1-10(a), the requirements of 326 IAC 6-1-10 do not apply.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

This source is subject to the control requirements of 326 IAC 6-1-11.1 for each facility and operation having a potential to emit five (5) tons per year or more of fugitive particulate matter. Pursuant to 326 IAC 6-1-11.1, the following particulate matter emission limitations apply:

- (a) Average instantaneous opacity of fugitive particulate emissions from paved and unpaved roads, parking lots, and from material transfer shall not exceed ten percent (10%) opacity;
- (b) A zero(0) percent frequency of visible emissions of materials during the inplant transportation of a material by truck or rail at any time;
- (c) Opacity of particulate emissions from dust handling equipment (i.e., equipment used to handle dust collected by control equipment) shall not exceed 10 percent opacity; and
- (d) Opacity of any facility or operation not specifically listed in 326 IAC 6-1-11.1 shall meet a 20 percent, three minute opacity standard.

The source will comply with these requirements by:

- (a) Applying water to all roads and parking lots on an as-needed basis; and
- (b) Either utilizing enclosed conveyor system equipped with a baghouse or a vacuum solid transfer system for bulk solid transfer.

326 IAC 6-3-2 (Particulate Emissions Limitations)

Limitations established at 326 IAC 6-3 do not apply if limitations established at 326 IAC 6-1 or 326 IAC 12 apply. Since the requirements of 326 IAC 6-1-11 apply to this source, 326 IAC 6-3 is not applicable.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to this rule, fugitive particulate matter emissions shall not be visible crossing property lines.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5(a), the requirements of this rule do not apply to a source of fugitive PM emission located in Lake County. Since this source is located in Lake County, this rule does not apply.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

Pursuant to 326 IAC 8-7, sources located in Lake County with the potential to emit of VOC from the bulk liquid transfer at a level equal to or greater than 25 tons per year and with the actual VOC emissions being limited to below 25 tons per year shall submit a certificate to OAM, stating that the facility is exempt from the requirements of 326 IAC 8-7-3. The certificate shall also contain the following information:

- (a) The name and address of the source and the name and telephone number of the company representative.
- (b) Identification of each VOC emitting facility together with a description of the purpose each facility serves.
- (c) A listing of facilities which meet the requirements of 326 IAC 8-7-2(a).
- (d) Baseline actual emissions for each facility identified in (c) together with the following the following information:
 - (1) Maximum design rate, maximum production, or maximum throughput.
 - (2) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated.
- (e) Procedures that will be used to monitor the source's potential emissions to ensure that they remain below 25 tons per year.

Compliance Requirements

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

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

The compliance monitoring requirements applicable to this source are as follows:

The bulk liquid transfer operations have applicable compliance monitoring conditions as specified below:

- (a) The amount of bulk liquids to be transferred are limited as follows:
 - (1) Non-HAP VOL
 - (A) 12,600,000 gallons per year of non-HAP VOL with a vapor pressure (at 78°F) equal to or less than 1.5 psia and greater than 0.5 psia;
 - (B) 12,600,000 gallons per year of non-HAP VOL with a vapor pressure (at 78°F) equal to or less than 0.5 psia; and
 - (C) 12,600,000 gallons per year of oil with a vapor pressure (at 78°F) equal to or less than 0.05 psia.
 - (2) HAP VOL
 - (A) 20,000,000 gallons per year of HAP VOL with a vapor pressure (at 78°F) equal to or less than 2.8 psia and greater than 2.0 psia;
 - (B) 30,000,000 gallons per year of HAP VOL with a vapor pressure (at 78°F) equal to or less than 2.0 psia and greater than 1.0 psia; and
 - (C) 24,000,000 gallons per year of HAP VOL with a vapor pressure (at 78°F) equal to or less than 1.0 psia.
 - (3) Hydrochloric Acid
 - (A) 65,000,000 gallons per year of hydrochloric acid (no more than 50% by weight in concentration) with a vapor pressure (at 78°F) equal to or less than 1.48 psia.
- (b) All bulk organic liquid transfers, except for low vapor materials (specifically oil), must utilize a vapor balance system equipped with false domes as VOC emissions control, at all times during the transfer. The VOC control efficiency for the vapor balance system must be, at a minimum, 86 percent.

- (c) All bulk acid transfers must utilize a wet scrubber as control, at all times during the transfer. The Permittee shall record the circulating water flow rates and pH values, at least once every two (2) hours when the acid transfer is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the water flow rate shall be maintained within the range of 70 to 90 gallons per minute and pH value must be between 5 and 6 or ranges of flow rate and pH value established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned ranges for any one reading.

These monitoring conditions are necessary because the amount of bulk liquid to be transferred, as well as the vapor balance system controlling VOC emissions and wet scrubber controlling acid emissions from bulk liquid transfers must operate properly to ensure compliance with 326 IAC 2-3 (Emission Offset) and 326 IAC 2-8 (FESOP).

The bulk solid transfer operations have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the bulk solid transfer exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the baghouse and filter for controlling the fully enclosed conveyor and the vacuum solid transfer, respectively, must operate properly to ensure compliance with 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements) and 326 IAC 5-1-2 (Visible Emissions Limitations).

Air Toxic Emissions

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

- (a) This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

Conclusion

The operation of this bulk liquid and solid material transfer source will be subject to the conditions of the attached proposed **FESOP No. F089-7702-00364**.

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

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

Source Name:	Bulk Intermodal Distribution Services, Inc.
Source Location:	1401 West 145th Street, East Chicago, IN 46312
SIC Code:	4214
County:	Lake
Operation Permit No.:	F089-7702-00364
Permit Reviewer:	Scott Pan/EVP

On March 3, 1998, the Office of Air Management (OAM) had a notice published in the Gary Post Tribune, Gary, Indiana and the Hammond Times in Munster, Indiana, stating that Bulk Intermodal Distribution Services, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a bulk liquid and solid material transfer source. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On April 20, 1998 and May 8, 1998, Bulk Intermodal Distribution Services (BiDS), Inc. submitted comments on the proposed construction permit. The summary of the comments and corresponding responses are as follows:

Comment #1:

BiDS requests that Sections A.2 (a) and A.2 (b) (page 5 of 35), as well as Items (a) and (b) of the equipment listing in Section D.1 (page 26 of 35), be reworded to more accurately reflect the actual operations of the terminal by allowing the terminal to splash load non-HAP containing organic liquids (VOL) with vapor pressure less than 0.5 psia. BiDS is willing to adjust the maximum monthly and annual throughput of the HAP VOLs downward slightly to offset the higher calculated VOC emissions from splash loading of the low vapor pressure non-HAP products. Additionally, delivery of VOLs may be accomplished by the use of rail tank cars with various capacities, and not only the 25,000 gallon railcars.

Response #1:

Sections A.2 (a) and A.2 (b), and Items (a) and (b) of the equipment listing in Section D.1 have been revised, to more accurately reflect the actual operations, as follows:

- (a) Transfer of bulk ~~organic liquids using the submerged liquid loading~~ **HAP VOL and non-HAP VOLs with vapor pressure greater than or equal to 0.5 psia**, using the submerged liquid loading method ~~from 25,000 gallon railcars to tank~~ **between rail tank cars and tanker trucks**, utilizing a vapor balance system equipped with false domes to recover vapor expelled from the ~~tank~~ **tanker trucks**;

- (b) Transfer of bulk ~~oil using the submerged liquid loading method~~ **non-HAP VOLs with vapor pressure less than 0.5 psia, from 25,000 gallon railcars to tank between rail tank cars and tanker trucks**, using the splash loading method;

Due to this change in loading method for the transfer of bulk non-HAP VOLs with vapor pressure less than 0.5 psia, PTE VOC of transferring non-HAP VOLs is increased 2.1 tons/yr from 7.3 tons/yr to 9.4 tons/yr (see revised page 2 of 4 TSD Appendix A). To maintain source wide PTE VOC at the 24 tons/yr level, the allowable HAP VOL throughputs are reduced to the following (strikeouts are original proposed throughputs):

- (1) **18,000,000** (~~20,000,000~~) gallons per year of HAP VOL with a vapor pressure (at 78°F) equal to or less than 2.8 psia and greater than 2.0 psia;
- (2) **24,000,000** (~~30,000,000~~) gallons per year of HAP VOL with a vapor pressure (at 78°F) equal to or less than 2.0 psia and greater than 1.0 psia; and
- (3) **20,700,000** (~~24,000,000~~) gallons per year of HAP VOL with a vapor pressure (at 78°F) equal to or less than 1.0 psia.

Condition D.1.1 (b) (page 26 of 35) and the corresponding Quarterly Report Form (page 34 of 35) are also revised accordingly.

Comment #2:

BiDS requests that Section A.2 (c) (page 5 of 35) and Item (c) of the equipment listing in Section D.1 (page 26 of 35) be revised to indicate that the maximum acid (only hydrochloric acid is transferred at the terminal) concentration transferred will be less than 37% by weight.

Response #2:

Section A.2 (c) and Item (c) of the equipment listing in Section D.1 have been revised as follows:

- (c) Transfer of bulk hydrochloric acid (no more than ~~50%~~ **37%** by weight in concentration) using the submerged liquid loading method ~~from 25,000 gallon railcars to tank~~ **between rail tank cars and tanker trucks**, utilizing a ~~transportable~~ **portable** counter-current ~~packed tower acid~~ scrubber for controlling acid fumes in the vent gas during the transfer;

Comment #3:

Due to the nature of bulk solid transfer at the terminal, such as a customer's request for special dedicated transfer equipment, it is difficult to predict the number of bulk solid transfer units needed at any time. In addition, the equipment for transferring bulk solid are small portable units that can be trucked to the facility for the length of a short-term contract. Thus, the number of units on site for handling the bulk solid at the terminal will fluctuate. In order to achieve the needed flexibility, BiDS requests that the number of units on site for bulk solid transfer listed in Section A.2 (d) (page 5 of 35) be removed.

Response #3:

Since the bulk solid transfer capacity of the terminal (20 shipments of 95 ton capacity railcar per day, or 1,900 tons per day) will remain the same, regardless of the number of transfer units on site, OAM agrees to revise Section A.2 (d) and the equipment listing of Section D.2 (page 29 of 35) as follows:

- ~~(d) Transfer of bulk solid from 95 ton railcars to trucks using:~~
- ~~(1) three (3) fully enclosed conveyor systems each equipped with a baghouse for particulate matter control; or~~
 - ~~(2) two (2) vacuum solid transfer systems, each equipped with a Mastervac internal filter for particulate matter control.~~

- (d) Transfer of bulk solid from railcars to trucks, with a maximum transfer capacity of 1,900 tons per day, using fully enclosed conveyor systems or vacuum solid transfer systems, each equipped with a Mastervac internal filter for particulate matter control.**

Comment #4:

BiDS request that the word "oil" in Condition D.1.1 (a (3) (page 26 of 35) and the corresponding Quarterly Report Form (page 34 of 35) be replaced with "non-HAP VOL" to allow for handling other non-HAP VOL with vapor pressure less than 0.05 psia.

Response #4:

Condition D.1.1 (a) (3) has been revised as follows:

- (3) 1,050,000 gallons per month of ~~oil~~ **non-HAP VOL** with a vapor pressure (at 78°F) equal to or less than 0.05 psia.

The word "oil" in the corresponding Quarterly Report Form has also been replaced with "non-HAP VOL".

Comment #5:

The hydrochloric acid vapor pressure provided in the original application was 1.48 psia (for 35.3% HCl @ 22°C). The most concentrated acid handled by the terminal will be 36.93% HCl which has a vapor pressure of 2.0 psia @ 22°C. In order to get the most operational flexibility, BiDS requests that the higher vapor pressure be used to calculate the allowable acid throughput and is willing to accept a lower throughput than the proposed allowable throughput.

Response #5:

Using the higher vapor pressure (2.0 psia) and the originally proposed allowable hydrochloric acid throughput of 65,000,000 gallons/yr, the HCl (HCl is not a VOC, but is a HAP) emissions are 7.7 tons/yr and total HAPs emissions are 22.3 tons/yr (see revised page 2 of 4 TSD Appendix A), while PTE VOC remains at 24.0 tons/yr. Therefore, the increase in vapor pressure of hydrochloric acid from 1.48 psia to 2.0 will not cause exceedance of any FESOP allowable emissions and it is not necessary to reduce the proposed allowable throughput of 65,000,000 gallons/yr.

Comment #6:

Based on recent tests performed at the terminal, the proper circulating water flow rate range for the portable scrubber unit is 10-15 gallons per minute and the proper pH value for the scrubber water is 1.0. BiDS requests that Condition D.1.5 (page 27 of 35) be revised to reflect the proper water flow rate range and pH value.

Response #6:

Condition D.1.5 is revised as follows:

D.1.5 Parametric Monitoring

The Permittee shall record the circulating water flow rates and pH values, at least once every two (2) hours when the acid transfer is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the water flow rate shall be maintained within the range of ~~70 to 90~~ **10 to 15** gallons per minute and pH value must be ~~between 5 and 6~~ **greater than 0.9** or ranges of flow rate and pH value established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned ranges for any one reading.

The instrument used for determining the water flow rate and pH value shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every day.

Bulk Intermodal Distribution Services, Inc.
1401 West 145th St., East Chicago, IN 46312
F089-7702
089-00364
Scott Pan/EVP
January 11, 1998

State Allowable Emissions (tons/year)

Emissions Generating Activity

Pollutant	Emissions Generating Activity			Total
	Bulk Liquid Transfer	Bulk Solid Transfer	Boiler	
VOC	347.8	0.0	0.0	347.8
PM	0.0	33.1	0.1	33.2
PM10	0.0	15.7	0.1	15.8
NOx	0.0	0.0	1.3	1.3
SO2	0.0	0.0	4.4	4.4
CO	0.0	0.0	0.3	0.3
Single HAP	133.9	0.0	0.0	133.9
Total HAP	312.6	0.0	0.0	312.6

Total emissions based on rated capacity at 8760 hours.

Federal Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Emissions Generating Activity			Total
	Bulk Liquid Transfer	Bulk Solid Transfer	Boiler	
VOC	24.0	0.0	0.0	24.0
PM	0.0	2.0	0.1	2.1
PM10	0.0	0.9	0.1	1.0
NOx	0.0	0.0	1.3	1.3
SO2	0.0	0.0	4.4	4.4
CO	0.0	0.0	0.3	0.3
Single HAP	7.8	0.0	0.0	7.8
Total HAP	22.5	0.0	0.0	22.5

**Appendix A: Emissions Calculations
Bulk Liquid and Solid Transfers**

**Company Name: Bulk Intermodal Distribution Services, Inc.
Address, City IN Zip: 1401 West 145th St., East Chicago, IN 46312
CP: F089-7702
Plt ID: 089-00364
Reviewer: Scott Pan/EVP
Date: May 12, 1998**

I. Bulk Liquid Transfer

Six (6) pumps, includes three (3) general pumps, two (2) HCl pumps and one (1) oil pump, are used to transfer bulk liquids.

VOC emissions due to bulk liquid transfer from railcars to trucks can be calculated using Equation (1) of US EPA AP-42, Section 5.2.2.1.1:

$$\text{Loading Loss (lb/1000 gallon of liquid loaded)} = 12.46 S \times P \times M/T$$

where: S = a saturation factor (S = 1.0 for submerged loading, 1.45 for splash loading)

P = true vapor pressure of liquid loaded (psia)

M = molecular weight of vapors (lb/lb-mole)

T = temperature of liquid loaded (degree R)

For each pump, maximum loading capacity = 25,000 gallons/railcar

Loading time: (3.571 hours to unload a railcar + 0.5 hours to move equipment + 0.5 hours to move railcar in and out) per railcar loading

Therefore, potential loading rate = 8760 hr/yr / (3.571+0.5+0.5) hr/railcar x 25,000 gallons/railcar = 47.91 million gallons/yr/pump.

Type of Material		Range of True (1) VP (psia)	Molecular Wt. (lb/lb-mole)	Max. Loading (1), (5) Loss (lb/1000 gal.)	Max. Throughput (2) (1000 gal/yr)	Max. Uncontrolled (3) Emissions (ton/yr)	Limited Throughput (1000 gallons/yr)	Control Efficiency	Controlled (4) Emissions (ton/yr)
Non-HAP VOL	Higher VP Materials	0.5 - 1.5	81.04	2.82	47,910	67.44	12,600	86.0%	2.5
	Lower VP Materials	< 0.5	40.00	0.67	47,910	16.09	12,600	86.0%	0.6
	Oil	0.05	600.00	1.01	47,910	24.13	12,600	0.0%	6.3
Non-HAP VOL Subtotal						107.66	37,800		9.4
HAP VOL	Higher VP Materials	2.0 - 2.8	86.20	5.59	47,910	133.91	18,000	86.0%	7.0
	Medium VP Materials	1.0 - 2.0	32.00	1.48	47,910	35.51	24,000	86.0%	2.5
	Low VP Materials	<1.0	150.00	3.47	47,910	83.22	20,700	86.0%	5.0
HAP VOL Subtotal						252.63	62,700		14.6
Non-VOL HAP	Hydrochloric Acid	2.0	36.50	1.69	95,820	81.00	65,000	86.0%	7.7
Total VOC Emissions						360.29			24.0
Total HAP Emissions						333.63			22.3

Notes:

- (1) Annual Average Temperature of 78 deg. F (538 deg R) and the corresponding true vapor pressures were used for calculating maximum loading losses.
- (2) Max. throughputs were based on the capacity of one (1) pump for all types of material, except for HCl transfer, for which the capacity of two (2) pumps was used.
- (3) Max. Uncontrolled Emissions (ton/yr) = Max. Loading Loss (lb/1000 gal) x Max. Throughput (1000 Gal/yr) x (1/2000) ton/lb
- (4) Controlled Emissions (ton/yr) = Max. Uncontrolled Emissions (tons/yr) x Limited Throughput (1000 Gal/yr) / Max. Throughput (1000 Gal/yr) x (1 - Control Efficiency (%))
(An overall control efficiency of 86% was used for all liquid transfers except for oil transfers which are not controlled)
- (5) All VOLs were transferred with submerged loading, except low vapor pressure (< 0.5 psi) non-HAP VOLs which use splash loading.

Appendix A: Emissions Calculations
Bulk Liquid and Solid Transfers

Company Name: Bulk Intermodal Distribution Services, Inc.
Address 1401 West 145th St., East Chicago, IN 46312
CP: F089-7702
Pit ID: 089-00364
Reviewer: Scott Pan/EVP
Date: January 11, 1998

II. Bulk Solid Transfer

Five (5) equipment transfers, including two (2) Mater Vacs transfers and three (3) conveyor transfers are used to transfer bulk solids. PM and PM-10 emissions due to bulk solid transfers can be calculated using Equation (1) of US EPA AP-42, Section 13.2.4:

$$\text{Emission Factor (lb/ton transferred)} = k \times (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4}$$

where: k = particle size multiplier (k = 0.74 for PM and k = 0.35 for PM-10)
U = mean wind speed (m/s, 7.2 m/s was used for the area)
M = material moisture content (%)

For each equipment, maximum loading capacity = 95 tons/railcar

Loading time: (5 hours to unload a railcar + 0.5 hours to move equipment + 0.5 hours to move railcar in and out) per railcar loading

Therefore, potential loading rate = 8760 hr/yr / (5+0.5+0.5) hr/railcar x 95 tons/railcar = 138,700 tons/yr/equipment.

Material Transferred	Moisture Content (%)	Max. Uncontrolled PM Emissions (ton/yr)	Max. Controlled PM Emissions (ton/yr)	Max. Uncontrolled PM10 Emissions (ton/yr)	Max. Controlled PM10 Emissions (ton/yr)
Catalyst Clay	0.2	6.63	0.40	3.13	0.19
Cement	0.2	6.63	0.40	3.13	0.19
Limestone	0.3	3.76	0.23	1.78	0.11
Magnasite	0.2	6.63	0.40	3.13	0.19
Plastic Pallets	0.2	6.63	0.40	3.13	0.19
Starblast	0.2	6.63	0.40	3.13	0.19
Synthetic Resin	0.2	6.63	0.40	3.13	0.19
Titanium Dioxides	12	0.02	0.00	0.01	0.00
TOTAL		33.13	1.99	15.67	0.94

Notes:

- (1) Max. Uncontrolled Emissions (ton/yr) = k x (0.0032) x (U/5)^{1.3} / (M/2)^{1.4} x 138,700 ton/yr x (1/2000) ton/lb
- (2) Controlled Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) x (1 - Control Efficiency(%)) (An overall control efficiency of 94% was used for all solid transfers.
- (3) Maximum total emissions are calculated using the following formula:
Total Emissions = 5 x worst case solid transfer emissions (There are five (5) solid transfer equipment; 3 enclosed conveyors and 2 vacuum transfer systems)

**Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors
#2 Fuel Oil**

Company Name: Bulk Intermodal Distribution Services, Inc.
Address, City IN Zip: 1401 West 145th St., East Chicago, IN 46312
CP: F089-7702
Pit ID: 089-00364
Reviewer: Scott Pan/EVP
Date: January 11, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.49**
2	125.14	

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	2.0	69.58 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.1	4.4	1.3	0.0	0.3

** Sulfur weight % is based on maximum allowable under 326 IAC 7-1.1-2 which limits boiler SO2 emissions to 0.5 lb/MMBtu.
Therefore, allowable sulfur content is calculated as: $0.5 \text{ lb/MMBtu} \times 0.14 \text{ MMBtu/gal oil} / 14.2 \text{ (lb/gal oil)} \times 100\% = 0.49\%$

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