



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

December 3, 1999

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

Lori F. Kaplan
Commissioner

MEMORANDUM

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky 
Chief, Permits Branch
Office of Air Management

SUBJECT: Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, within (18) eighteen days of the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing: (1) The date the document is delivered to the Office of Environmental Adjudication (OEA). (2) The date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail. (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other for which you seek review by permit number, name of the applicant, location, date of this notice and the following: (1) the name and address of the person making the request; (2) the interest of the person making the request; (3) identification of any persons represented by the person making the request; (4) the reasons, with particularity, for the request; (5) the issues, with particularity, proposed for consideration at any hearing; (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to IC 4-21.5-3-5 (d), the Office of Environmental Adjudication will provide you with notice of any prehearing conferences, preliminary hearing, hearings, stays, or orders disposing of the review of this decision if a written request is submitted to the Office of Environmental Adjudication at the above address. If you have procedural or scheduling questions regarding your petition, you may contact the Office of Environmental Adjudication at 317-232-8591. If you have any other questions regarding the enclosed document, please contact the Office of Air Management (OAM) at 317-233-0178.

Attachment

FNPER/WPD
09/1 3199



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December 3, 1999

Major William S. Schaff, Jr.
Newport Chemical Depot
P.O. Box 121
Newport, Indiana 47966-0121

Re: 165-9659
Second Significant Revision to
FESOP 165-5470-00003

Dear Major Schaff:

Newport Chemical Depot was issued a permit on December 11, 1996 for a Newport Chemical Agent Disposal Facility (NECDF). A letter requesting changes to this permit was received on April 9, 1998. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of adding the following:

- (1) Three (3) natural gas fired boilers, identified as EU Boiler 2401 A/B/C, each rated at 14.6 million (MM) British thermal units (Btu) per hour and using #2 fuel oil as a backup, each exhausting at one (1) stack identified as S/V 70, 71 and 72, respectively;
- (2) Three (3) emergency type generators:
 - (a) two (2) #2 fuel oil generators, each rated at 1,750 kW, each exhausting at one (1) stack identified as S/V 73 and 74, respectively;
 - (b) one (1) #2 fuel oil generator rated at 250 kW, exhausting at one (1) stack identified as S/V 75;
- (3) One (1) CDB neutralization process, identified as containing TCC Operations, Drained Agent Reactors, Hydrolysate and other Tanks, exhausting through one (1) stack identified as S/V 76, air emissions controlled by carbon filters and hydrolysate treated by the SCWO listed in (j);
- (4) Two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal and Catalytic Oxidizers, rated at 50 and 202 pounds per day of hydrolysate feed, respectively, and exhausting to one (1) stack identified as S/V 77.
- (5) The pollutant emitting activities related to the construction of the NECDF are as follows:
 - (A) operation of generators;
 - (B) operation of internal combustion (IC) engines; and
 - (C) miscellaneous construction related fugitive and non-fugitive insignificant activities.
- (6) One (1) non-emergency type gasoline generator, located in Building 718A and rated at 5 kilowatts (kW):

- (7) Eleven (11) gasoline pumps (internal combustion engines):
 - I.; three (3) pumps, located in Building 733K and each rated at 20 horsepower (HP);
 - one (1) pump, located in Building 717A and rated at 20 HP;
 - (3) one (1) pump, located in Building 718A and rated at 20 HP;
 - (4) one (1) pump, located in Building 718A and rated at 12 HP;
 - (5) one (1) pump, located in Building 717A and rated at 10 HP;
 - (6) two (2) pumps, located in Building 718A and each rated at 8 HP;
 - (7) one (1) pump, located in Building 710 and rated at 7.5 HP; and
 - (8) one (1) pump, located in Building 725A and rated at 3 HP;
- (8) Five (5) maintenance units (internal combustion engines):
 - (A) three (3) gasoline fired engines, located in Building 718A and each rated at 5.5, 20 and 10 HP, respectively;
 - (B) one (1) diesel fired engine, located in Building 725A and rated at 65 HP; and
 - (C) one (1) gasoline fired engine, located in Building 725A and rated at 55 HP.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11, through 13-20; 13-22 through 13-25; and 13-30) the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-1 5-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-1 1 .I, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Pan, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Duane Van Laningham or extension (3-6878) or dial (973) 575-2555, extension 3248.

Sincerely,


Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

SCPIEVP

cc: File - Vermillion County
U.S. EPA, Region V
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner



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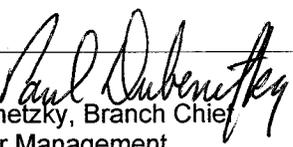
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

**Newport Chemical Depot (NECD)
Indiana State Road 63
Newport, Indiana 47966-0121**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F165-5470-00003	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 11, 1996
Exemption: 165-8390	Issuance Date: July 1997
First Significant Revision: SMF165-9701	Issuance Date: October 7, 1998
First Minor Permit Revision: MMF165-10289	Issuance Date: April 23, 1999

Second Significant Revision: SMF165-9659	Pages Affected: 4, 5, 6, 7, 7b, 23, 25a, 25b, 25c, 25d, 25e, 25f, 25g, 25h, 25i, 25j, 25k, 25l, 30c, 30d, 30e and 30f
Issued by:  Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 3, 1999

SECTION A SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates the operations necessary for maintaining a National Defense - Chemical Stockpile Storage site consisting mainly of internal combustion engines for electrical power generation.

Responsible Official: Major Mark A. Welch
Source Address: Indiana State Road 63, Newport, Indiana, 47966-0160
Mailing Address: P.O. Box 160, Newport, Indiana, 47966-0160
SIC Code: 9711
County Location: Vermillion
County Status: Attainment for all criteria pollutants
Source Status: Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary

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

- (a) twelve (12) non-emergency type generators:
- (1) four (4) diesel generators individually rated at 6 kilowatts (kW), each exhausting at one (1) stack identified as S/V 16, 17, 18, and 19;
 - (2) one (1) diesel generator rated at 155 kW, exhausting at one (1) stack identified as S/V 20;
 - (3) one (1) fire pump engine rated at 164.1 kW, exhausting at one (1) stack identified as S/V 27;
 - (4) one (1) gasoline generator rated at 3.5 kW, exhausting at one (1) stack identified as S/V 28;
 - (5) one (1) gasoline generator rated at 4 kW, exhausting at one (1) stack identified as S/V 29;
 - (6) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 33;
 - (7) one (1) propane generator rated at 35 kW, exhausting at one (1) stack identified as S/V 57;
 - (8) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 58; and
 - (9) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 59;
- (b) eleven (11) emergency type generators:
- (1) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 21;
 - (2) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 22;

- (3) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 23;
 - (4) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 24;
 - (5) one (1) diesel generator rated at 255 kW, exhausting at one (1) stack identified as S/V 25;
 - (6) two (2) gasoline generators individually rated at 4 kW, each exhausting at one (1) stack identified as S/V 30 and 34;
 - (7) one (1) propane generator rated at 11 kW, exhausting at one (1) stack identified as S/V 37;
 - (8) two (2) natural gas generators individually rated at 125 kW, each exhausting at one (1) stack identified as S/V 55 and S/V 56; and
 - (9) one (1) 941 PDS trailer rated at 25 kW, exhausting at one (1) stack identified as S/V 60;
- (c) One (1) TML wastewater incinerator rated at 500 pounds per hour and identified as EU 9, exhausting at one (1) stack identified as S/V 51;
 - (d) One (1) diesel-fired generator, identified as 63, with a maximum rated capacity of 67 horsepower (hp), exhausting to one (1) stack (S/V 63);
 - (e) Two (2) gasoline-fired generators, identified as 64 and 65, each with maximum rated capacity of 9 horsepower (hp), each exhausting to one (1) stack (S/V 64 and 65, respectively);
 - (f) One (1) diesel-fired air compressor, identified as 66, with maximum heat input capacity of 80 horsepower (hp), exhausting to one (1) stack (66);
 - (g) Three (3) natural gas fired boilers, identified as EU Boiler 2401 A/B/C, each rated at 14.6 million (MM) British thermal units (Btu) per hour and using #2 fuel oil as a backup, each exhausting at one (1) stack identified as S/V 70, 71 and 72, respectively;
 - (h) Three (3) emergency type generators:
 - (1) two (2) #2 fuel oil generators, each rated at 1,750 kW, each exhausting at one (1) stack identified as S/V 73 and 74, respectively;
 - (2) one (1) #2 fuel oil generator rated at 250 kW, exhausting at one (1) stack identified as S/V 75;
 - (i) One (1) CDB neutralization process, identified as containing TCC Operations, Drained Agent Reactors, Hydrolysate and other Tanks, exhausting through one (1) stack identified as S/V 76, air emissions controlled by carbon filters and hydrolysate treated by the SCWO listed in (j); and
 - (j) Two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal Oxidizers, rated at 50,202 pounds per day of hydrolysate feed, and exhausting to one (1) stack identified as S/V 77.

- (k) The pollutant emitting activities related to the construction of the NECDF are as follows:
 - (1) operation of generators;
 - (2) operation of internal combustion (IC) engines; and
 - (3) miscellaneous construction related fugitive and non-fugitive insignificant activities.

- (l) One (1) non-emergency type gasoline generator, located in Building 718A and rated at 5 kilowatts (kW):

- (m) Eleven (11) gasoline pumps (internal combustion engines):
 - (1) three (3) pumps, located in Building 733K and each rated at 20 horsepower (HP);
 - (2) one (1) pump, located in Building 717A and rated at 20 HP;
 - (3) one (1) pump, located in Building 718A and rated at 20 HP;
 - (4) one (1) pump, located in Building 718A and rated at 12 HP;
 - (5) one (1) pump, located in Building 717A and rated at 10 HP;
 - (6) two (2) pumps, located in Building 718A and each rated at 8 HP;
 - (7) one (1) pump, located in Building 710 and rated at 7.5 HP; and
 - (8) one (1) pump, located in Building 725A and rated at 3 HP;

- (n) Five (5) maintenance units (internal combustion engines):
 - (1) three (3) gasoline fired engines, located in Building 718A and each rated at 5.5, 20 and 10 HP, respectively;
 - (2) one (1) diesel fired engine, located in Building 725A and rated at 65 HP; and
 - (3) one (1) gasoline fired engine, located in Building 725A and rated at 55 HP.

A.3 Insignificant Activities

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

- (a) one (1) natural gas fired boiler identified as Building 7700 Boiler rated at 2.51 million (MM) British thermal units per hr and using #2 fuel oil as a backup, exhausting at one (1) stack;
- (b) one (1) 1,000 gallon capacity diesel fuel underground storage tank (UST) identified as Tank #144, exhausting at one emission point;
- (c) one (1) 550 gallon capacity diesel fuel UST identified as Tank #6178, exhausting at one emission point;
- (d) two (2) walk-in paint booths exhausting at two emission points;
- (e) one (1) toxic monitoring lab (TML) with chemical usage, exhausting at one (1) stack;
- (f) one (1) 275 gallon capacity diesel fuel AST identified as Tank 733K, exhausting at one emission point;
- (g) one (1) 550 gallon capacity diesel fuel UST identified as Tank 3005, exhausting at one emission point;
- (h) one (1) 550 gallon capacity No. 2 fuel oil UST identified as Tank 7703-1, exhausting at one emission point;
- (i) four (4) cold cleaning degreasing units in Bldgs 716A & 717A, each building exhausting at one (1) stack respectively;

- (j) one (1) 18,000 gallon capacity propane AST identified as Propane Tank at Propane Station;
- (k) one (1) woodworking operation exhausting at one (1) emission point;
- (l) one (1) mobile abrasive blaster rated at 107.1 pounds blast media;
- (m) one (1) gasoline dispensing station with fuel dispensing of less than 1,300 gallons per day, exhausting at one emission point;
- (n) one (1) 10,000 gallon capacity gasoline UST, exhausting at one emission point.
- (o) additional miscellaneous insignificant activities as:
 - (1) boilers/heaters (excluding Building 7700);
 - (2) medical lab;
 - (3) wastewater treatment facility;
 - (4) combustion start-up;
 - (5) 10,000 gallon capacity diesel fuel storage tank;
 - (6) fire training activities;
 - (7) asbestos abatement projects;
 - (8) water treatment;
 - (9) toxic laundry;
 - (10) pesticides/herbicides;
 - (11) structural painting;
 - (12) welding;
 - (13) air conditioning & refrigeration units;
 - (14) fire suppression systems;
 - (15) road paving;
 - (16) fixed abrasive blaster;
 - (17) protective mask cleaning;
 - (18) weapons cleaning; and
 - (19) miscellaneous chemical usage; and
- (p) miscellaneous fugitive activities:
 - (1) landfills ;
 - (2) small arms firing;
 - (3) storage piles;
 - (4) road dust; and
 - (5) prairie burns, stated as up to 70 acres per year.
- (q) One (1) diesel storage tank, identified as Diesel Tank #1, with maximum storage capacity of 1,000 gallons; and
- (r) One (1) oxyacetylene and stick welding station, with maximum wire consumption rate of 2.01 pounds per hour.
- (s) Paved and unpaved roads and parking lots with public access;
- (t) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;

- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (v) On-site fire and emergency response training approved by the department;
- (w) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
 - (2) Diesel generators not exceeding 1600 horsepower;
 - (3) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower;
- (x) Stationary fire pumps;
- (y) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 tons per year of a single HAP;
- (z) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day of 2.5 tons per year of any combination of HAPs.
- (aa) Two (2) propane fired hot water heaters, each rated at 0.179 million British thermal units per hour (mmBtu/hr); and
- (bb) One (1) diesel generator and one (1) air compressor, each rated at 5 HP.

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 Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION D.1 FACILITY OPERATION CONDITIONS

twelve (12) non-emergency type generators:

- (a) four (4) diesel generators individually rated at 6 kilowatts (kW), each exhausting at one (1) stack identified as S/V 16, 17, 18, and 19;
- (b) one (1) diesel generator rated at 155 kW, exhausting at one (1) stack identified as S/V 20;
- (c) one (1) fire pump engine rated at 164.1 kW, exhausting at one (1) stack identified as S/V 27;
- (d) one (1) gasoline generator rated at 3.5 kW, exhausting at one (1) stack identified as S/V 28;
- (e) one (1) gasoline generator rated at 4 kW, exhausting at one (1) stack identified as S/V 29;
- (f) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 33;
- (g) one (1) propane generator rated at 35 kW, exhausting at one (1) stack identified as S/V 57;
- (h) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 58; and
- (i) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 59.

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

D.1.1 Carbon Monoxide

The hours of operation of each non-emergency generator shall not exceed 360 hours per twelve (12) consecutive months. The total hours for each month shall not exceed the difference between the annual limit minus the sum of the actual hours of operation from the previous eleven (11) months. Compliance is based on the total hours of operation during the previous 12 months. During the first twelve months of operation under this permit, the hours of operation shall be limited such that the total hours used divided by the accumulated months of operation shall not exceed 30 hours per month. This operating limit shall limit the total carbon monoxide (CO) emissions from the non-emergency generators to 3.77 tons per twelve (12) month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

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

D.1.2 Hours of Non-emergency Generator Operation

The Permittee shall maintain records at the source of the hours of operation for each non-emergency generator. The records shall be complete and sufficient to establish compliance with the hours of usage limits and/or CO emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The hours of operation for each month of non-emergency generator usage; and
- (b) The 12 month rolling total of hours of operation for each non-emergency generator.

D.1.3 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.1.1 shall be submitted, to the address listed in Section C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (d) One (1) diesel-fired generator, identified as 63 with a maximum rated capacity of 67 horsepower (hp), exhausting to one (1) stack (S/V 63);
- (e) Two (2) gasoline-fired generators, identified as 64 and 65, each with a maximum rated capacity of 9 horsepower (hp), each exhausting to one (1) stack (S/V 64 and 65, respectively);
- (f) One (1) diesel-fired air compressor, identified as 66, with a maximum heat input capacity of 80 horsepower (hp) exhausting to one (1) stack (66);
- (Insignificant) One (1) oxyacetylene welding station, with maximum capacity of 32.1 pounds of electrodes per hour.

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

D.4.1 Oxides of Nitrogen (NOx) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the one (1) diesel-fired generator, two (2) gasoline-fired and one (1) diesel-fired air compressor shall each be limited to 3,120 hours of operation each year. This is equivalent to 27.5 tons NOx per year. Compliance with this limit makes 326 IAC 2-7 (Part 70) not applicable.

D.4.2 Particulate Matter [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the Particulate Matter (PM) from the one (1) oxyacetylene welding station shall be limited to 0.25 pounds as established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-8-5(a)(1),(4)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Oxides of Nitrogen (NOx) or Particulate Matter (PM) limits specified in Conditions D.4.1 and D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.4.4 Record Keeping Requirements

To document compliance with Condition D.4.1, the Permittee shall maintain monthly records of hours of operation of the three (3) diesel-fired generators and the one (1) diesel-fired air compressor.

D.4.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5 FACILITY OPERATION CONDITIONS

- (g) Three (3) natural gas fired boilers, identified as EU Boiler 2401 A/B/C, each rated at 14.6 million (MM) British thermal units per hr and using #2 fuel oil as a backup, each exhausting at one (1) stack identified as S/V 70, 71 and 72, respectively;

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

D.5.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from all facilities used for indirect heating purposes which were constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per million Btu heat input

Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Note: This information is a confidential trade secret.

Based on the above equation, particulate matter emissions from the three boilers shall each be limited to 0.402 pounds of particulate matter per million British thermal units heat input.

D.5.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from each of the three 14.6 MMBtu per hour boilers shall not exceed five tenths (0.5) pounds per million Btu heat input when burning fuel oil.
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

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

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limitations specified in Condition D.5.1 and/or the sulfur dioxide limitations specified in Condition D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.4 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in

40 CFR 60, Appendix A, Method 19.

- (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
- (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

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

D.5.5 Visible Emissions Notations

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

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

D.5.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and

- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

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

- (b) To document compliance with Condition D.5.5, the Permittee shall maintain records of visible emission notations of the three boiler stack exhausts once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.1 and D.5.2 in any compliance period when No. 2 fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.6 FACILITY OPERATION CONDITIONS

- (h) Three (3) emergency type generators:
- (1) two (2) #2 fuel oil generators, each rated at 1,750 kW, each exhausting at one (1) stack identified as S/V 73 and 74, respectively;
 - (2) one (1) #2 fuel oil generator rated at 250 kW, exhausting at one (1) stack identified as S/V 75;

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

D.6.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

Operation of each emergency generator shall not exceed 500 hours per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual hours of operation from the previous eleven (11) months. Compliance is based on the total hours of operation during the previous 12 months. During the first 12 months of operation under this permit, the hours of operation shall be limited such that the total hours used divided by the accumulated months of operation shall not exceed 41.5 hours per month. This operating limit shall limit total sulfur dioxide (SO₂), volatile organic compounds (VOC), carbon monoxide (CO) and nitrogen oxides (NO_x) emissions from the three (3) emergency generators to 5.18, 1.01, 6.09 and 18.88 tons per twelve (12) month period rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply.

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

D.6.2 Hours of Emergency Generator

The Permittee shall maintain records at the source of the hours of operation for each emergency generator. The records shall be complete and sufficient to establish compliance with the hours of usage limits and/or CO and NO_x emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The hours of operation for each month of emergency generator usage; and
- (b) The 12 month rolling total of hours of operation for each emergency generator.

D.6.3 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.6.1 shall be submitted, to the address listed in Section C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

SECTION D.7 FACILITY OPERATION CONDITIONS

- (i) One (1) CDB neutralization process, identified as containing TCC Operations, Drained Agent Reactors, Hydrolysate and other Tanks, exhausting through one (1) stack identified as S/V 76, with air emissions controlled by carbon filters and hydrolysate treated by the SCWO listed in (j)

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

D.7.1 Volatile Organic Compounds (VOCs)

The CDB neutralization process shall process no more than 6 Tonne containers per day. The concentration of VX in the exhaust gas, when emitting to the atmosphere, shall be limited to 0.06 micrograms per cubic meter. This operating limit shall limit total volatile organic compound (VOC) emissions from the CDB process to 1.36 tons per twelve (12) month period rolled on a monthly basis.

Compliance Determination Requirements

D.7.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.7.3 Carbon Adsorption Filters - Operation

As required by operation condition C.6(b), the carbon adsorption filter banks, which are considered to be the integral part of the neutralization CDB process, shall be operated at all times when Tonne containers are being processed.

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

D.7.4 Daily Visible Checks for Leaks

- (a) Daily checks for leaks during CDB operations shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any detected leaks and the date of such leaks.
- (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, checks shall be taken during that part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
- (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 liquid leaks for that specific process.
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when a liquid leak is observed.

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

D.7.5 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.7.1.
- (1) The amount of ton containers processed each day; and
 - (2) A log of the dates of operation.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.8 FACILITY OPERATION CONDITIONS

- (j) Two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal Oxidizers, rated at 50,202 pounds per day of hydrolysate feed, and exhausting to one (1) stack identified as S/V 77, with air emissions controlled by carbon filters

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

D.8.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

The input to the two (2) SCWO reactors shall not exceed 50,202 pounds per day of hydrolysate feed. This operating limit shall limit total SO₂, VOC, CO and NO_x emissions from the SCWO to 13.97, 0.01, 1.93 and 4.78 tons per twelve (12) month period rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply.

Compliance Determination Requirements

D.8.2 Minimum Operating Temperature

The SCWO shall operate with an average temperature of at least 1,200 °F and at a minimum of no less than 900 °F or the temperature established during the latest stack test. Operation at or above this minimum temperature ensures compliance with the destruction efficiency required for correct operation of the SCWO and with the emission limitations of Condition D.8.1.

D.8.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the SO₂, VOC, CO and NO_x limits specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.8.4 Carbon Adsorption Filters - Operation

As required by operation condition C.6(b), the carbon adsorption filter banks, which are considered to be the integral part of the SCWO process shall be operated at all times when hydrolysate is being processed.

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

D.8.5 Daily Visible Checks for Leaks

- (a) Daily checks for leaks during SCWO operations shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any detected leaks and the date of such leaks.
- (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, checks shall be taken during that part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
- (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 liquid leaks for that specific process.

- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when a liquid leak is observed.

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

D.8.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.8.1 and D.8.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the NO_x usage limits and/or the NO_x emission limits established in Conditions D.8.1 and D.8.2.
 - (1) The amount of hydrolysate processed each day;
 - (2) A log of the dates of operation;
 - (c) The minimum operating temperature in °F; and
 - (d) The average operating temperature in °F.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.8.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.8.1 and D.8.2 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.9 FACILITY OPERATION CONDITIONS

- (k) The pollutant emitting activities related to the construction of the NECDF are as follows:
- (1) operation of generators;
 - (2) operation of internal combustion (IC) engines; and
 - (3) miscellaneous construction related fugitive and non-fugitive insignificant activities.

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

D.9.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

During the construction of the NECDF, the emissions of SO₂, VOC, CO and NO_x due to the operation of generators and internal combustion (IC) engines (excluding mobile sources such as, backhoes, bulldozers, and other construction equipment) related to the construction shall not exceed 1.92, 0.36, 3.23 and 3.09 tons per month, respectively. Once the construction of the new NECDF equipment has been completed, the limits for the construction activities under Condition D.9.1 will expire and NECDF can start operating. Therefore, the requirements of 326 IAC 2-7 do not apply.

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

D.9.2 Hours of Emergency Generator Operation

The Permittee shall maintain records at the source of the hours of operation and the type of fuel used for each generator and internal combustion (IC) engine related to the construction of the NECDF. The records shall be complete and sufficient to establish compliance with the SO₂, VOC, CO and NO_x emission limits established in D.9.1. The records shall contain a minimum of the following:

- (a) The hours of operation for each month for each generator and internal combustion (IC) engine related to the construction of the NECDF;
- (b) The type of fuel used for each generator and internal combustion (IC) engine related to the construction of the NECDF; and
- (c) The monthly SO₂, VOC, CO and NO_x emissions, calculated by using emission factors for generators and IC engines provided in Chapter 3 of the most recent edition of USEPA's AP-42.

D.9.3 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.9.1 shall be submitted, to the address listed in Section C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

SECTION D.10 FACILITY OPERATION CONDITIONS

- (l) One (1) non-emergency type gasoline generator, located in Building 718A and rated at 5 kilowatts (kW):
- (m) Eleven (11) gasoline pumps (internal combustion engines):
 - (1) three (3) pumps, located in Building 733K and each rated at 20 horsepower (HP);
 - (2) one (1) pump, located in Building 717A and rated at 20 HP;
 - (3) one (1) pump, located in Building 718A and rated at 20 HP;
 - (4) one (1) pump, located in Building 718A and rated at 12 HP;
 - (5) one (1) pump, located in Building 717A and rated at 10 HP;
 - (6) two (2) pumps, located in Building 718A and each rated at 8 HP;
 - (7) one (1) pump, located in Building 710 and rated at 7.5 HP; and
 - (8) one (1) pump, located in Building 725A and rated at 3 HP;
- (n) Five (5) maintenance units (internal combustion engines):
 - (1) three (3) gasoline fired engines, located in Building 718A and each rated at 5.5, 20 and 10 HP, respectively;
 - (2) one (1) diesel fired engine, located in Building 725A and rated at 65 HP; and
 - (3) one (1) gasoline fired engine, located in Building 725A and rated at 55 HP.

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

D.10.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

Operation of the gasoline generator shall not exceed 360 hours per twelve (12) consecutive months and operation of the sixteen (16) internal combustion engines shall not exceed 180 hours per twelve (12) consecutive months each. The total for each month shall not exceed the difference between the annual limit minus the sum of actual hours of operation from the previous eleven (11) months. Compliance is based on the total hours of operation during the previous 12 months. During the first 12 months of operation under this permit, the hours of operation shall be limited such that the total hours used divided by the accumulated months of operation shall not exceed 30 hours per month for the gasoline generator and 15 hours per month for each of the sixteen (16) internal combustion engines. These operating limits shall limit total SO₂, VOC, CO and NO_x emissions from the gasoline generator and the sixteen (16) internal combustion engines to 0.03, 9.64, 1.01 and 0.43 tons per twelve (12) month period rolled on a monthly basis, respectively (emissions are calculated by using the emission factors for generators and IC engines provided in Chapter 3 of the most recent edition of USEPA's AP-42). Therefore, the requirements of 326 IAC 2-7 do not apply.

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

D.10.2 Hours of Gasoline Generator and IC Engine

The Permittee shall maintain records at the source of the hours of operation for the gasoline generator and the sixteen (16) internal combustion engines. The records shall be complete and sufficient to establish compliance with the hours of usage limits and/or CO and NO_x emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The hours of operation for each month of the gasoline generator and the sixteen (16) internal combustion engines usage; and
- (b) The 12 month rolling total of hours of operation for each of the gasoline generator and the sixteen (16) internal combustion engines.

D.10.3 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.10.1 shall be submitted, to the address listed in Section C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

COMPLIANCE DATA SECTION

NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
Significant Revision No.: SSM 165-9659-00003

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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:

FESOP Quarterly Report

Source Name: Newport Chemical Depot
 Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
 Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
 FESOP No.: F165-5470-00003
 Facility: One (1) diesel-fired generator, two (2) gasoline-fired generators and one (1) diesel-fired air compressor
 Parameter: SO₂, VOC, CO and NOx
 Limit: 3,120 hours of operation for each generator or compressor

YEAR: _____

Month	Equipment	Column 2	Column 3	Column 2 + Column 3
		Hours of Operation This Month	Hours of Operation Previous 11 Months	Hours of Operation 12 Month Total
	Generator (63)			
	Generator (64)			
	Generator (65)			
	Compressor (66)			
	Generator (63)			
	Generator (64)			
	Generator (65)			
	Compressor (66)			
	Generator (63)			
	Generator (64)			
	Generator (65)			
	Compressor (66)			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

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

FESOP Quarterly Report

Source Name: Newport Chemical Depot
 Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
 Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
 FESOP No.: F165-5470-00003
 Facility: Generators and internal combustion (IC) engines related to the construction of the NECDF
 Parameter: SO₂, VOC, CO and NO_x
 Limit: SO₂ - 1.92 tons per month; VOC - 0.36 tons per month
 CO - 3.23 tons per month; NO_x - 3.09 tons per month
 (Emissions shall be determined by using emission factors for generators and IC engines provided in Chapter 3 of the most recent edition of USEPA's AP-42)

YEAR: _____

Month	Equipment	Hours of Operation This Month	Type of Fuel Used	Emissions (tons/month)			
				SO ₂	VOC	CO	NO _x
	Generators						
	IC Engines						
	Generators						
	IC Engines						
	Generators						
	IC Engines						

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

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

FESOP Quarterly Report

Source Name: Newport Chemical Depot
 Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
 Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
 FESOP No.: F165-5470-00003
 Facility: The gasoline generator in Building 718A and the sixteen (16) internal combustion engines in Buildings 710, 717A, 718A, 725A and 733K
 Parameter: SO₂, VOC, CO and NOx
 Limit: 360 hours of operation per twelve (12) month period for the gasoline generator, 180 hours of operation per twelve (12) month period for the sixteen (16) internal combustion engines.

YEAR: _____

Bldg.	Unit ID.	Month: _____			Month: _____			Month: _____		
		Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot
718A	Gas. Gen. (5 kW)									
733K	20 hp pump-#1									
733K	20 hp pump-#2									
733K	20 hp pump-#3									
717A	20 hp pump									
718A	20 hp pump									
718A	12 hp pump									
717A	10 hp pump									
718A	8 hp pump									
710	7.5 hp pump									
725A	3 hp pump									
718A	5.5 hp maint. unit									
718A	20 hp maint. unit									
718A	10 hp maint. unit									
725A	65 hp maint. unit									
725A	55 hp maint. unit									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

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

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

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

Source Name:	Newport Chemical Depot
Source Location:	Indiana State Road 63, Newport, Indiana 47966-0160
SIC Code:	9711
County:	Vermillion
Operation Permit No.:	F165-5470-00003
Significant Rev. No.:	SMF165-9659-00003
Permit Reviewer:	Scott Pan/EVP

On September 9, 1999, the Office of Air Management (OAM) had a notice published in the Daily Clintonian, Clinton, Indiana, stating that Newport Chemical Depot had applied for a significant revision to a Federally Enforceable State Operating Permit (FESOP) to operate a chemical agent disposal facility. The notice also stated that OAM proposed to issue a significant permit revision to a FESOP for this operation and provided information on how the public could review the proposed significant permit revision to a 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 significant permit revision to a FESOP should be issued as proposed.

On October 28, 1999, Newport Chemical Depot submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

Comment #1:

Section A.1 should be revised to reflect the recent changes. The current Commander for the source is Major Mark A. Welch and the post office box number and zip code for the source have been changed to P. O. Box 160 and 47966-0160, respectively.

Response #1:

General Information in Section A.1 has been revised as follows:

Responsible Official:	Major William S. Schaff, Jr. Mark A. Welch
Source Address:	Indiana State Road 63, Newport, Indiana, 47966-012 160
Mailing Address:	P.O. Box 12 160 , Newport, Indiana, 47966-012 160
SIC Code:	9711
County Location:	Vermillion
County Status:	Attainment for all criteria pollutants
Source Status:	Synthetic Minor Source, FESOP Program

Comment #2:

In Section A.3, item (f) should be one (1) 275 gallon tank, not a 255 gallon tank and the tank has been moved to another location identified as Tank 733K.

Response #2:

Item (f) in Section A.3 has been revised as follows:

- (f) one (1) **2575** gallon capacity diesel fuel AST identified as Tank ~~403~~ **733K**, exhausting at one emission point;

The tank is still considered insignificant with this increase in capacity.

Comment #3:

It is indicated in the TSD that information about the generators SV 63, 64 and 65 have been changed, but there is no change in the related Section D.4.

Response #3:

The equipment list for Section D.4 (page 25a) has been revised as follows:

Facility Description [326 IAC 2-8-4(10)]

- (d) ~~Three (3)~~ **One (1)** diesel-fired generators, identified as 63, ~~64 and 65~~, each with a maximum **rated** heat input capacity of **67 horsepower (hp)**, 1.0 million British thermal units per hour (mmBtu/hr), each exhausting to one (1) stack (~~S/V 63, 64, and 65~~);
- (e) **Two (2) gasoline-fired generators, identified as 64 and 65, each with a maximum rated capacity of 9 horsepower (hp), each exhausting to one (1) stack (S/V 64 and 65, respectively);**
- ~~(e)~~(f) One (1) diesel-fired air compressor, identified as 66, with a maximum heat input capacity of 1.0 million British thermal units per hour (mmBtu/hr) **80 horsepower (hp)** exhausting to one (1) stack (66);
- (Insignificant) One (1) oxyacetylene welding station, with maximum capacity of 32.1 pounds of electrodes per hour.

Additionally, Condition D.4.1 was revised as follows:

D.4.1 Oxides of Nitrogen (NOx) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the ~~three (3)~~ **one (1)** diesel-fired **generator, two (2) gasoline-fired** generators and one (1) diesel-fired air compressor shall each be limited to 3,120 hours of operation each year. This is equivalent to 27.5 tons NOx per year. Compliance with this limit makes 326 IAC 2-7 (Part 70) not applicable.

Quarterly Report form for the one (1) diesel-fired generator, two (2) gasoline-fired generators and one (1) diesel-fired air compressor has been revised as follows:

FESOP Quarterly Report

Source Name: Newport Chemical Depot
 Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
 Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
 FESOP No.: F165-5470-00003
 Facility: ~~Three (3)~~ **One (1)** diesel-fired generator, **two (2)** gasoline-fired generators and **one (1) diesel-fired air compressor**
 Parameter: SO₂, VOC, CO and NOx
 Limit: ~~500~~ **3,120** hours of operation for each generator or compressor

YEAR: _____

Month	Equipment	Column 2	Column 3	Column 2 + Column 3
		Hours of Operation This Month	Hours of Operation Previous 11 Months	Hours of Operation 12 Month Total
	Generator (763)			
	Generator (764)			
	Generator (765)			
	Compressor (66)			
	Generator (763)			
	Generator (764)			
	Generator (765)			
	Compressor (66)			
	Generator (763)			
	Generator (764)			
	Generator (765)			
	Compressor (66)			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

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

Comment #4:

Newport Chemical Depot requests that the guidance for preparing a Compliance Response Plan, as required by Condition D.5.5(e), be provided.

Response #4:

The plan is prepared on a case-by-case basis, depending on whatever is suitable for the concerned unit. The plan can be prepared in any format, as long as it contains at a minimum troubleshooting contingency and response steps for when an abnormal emission is observed. OAM Compliance Branch can be contacted for guidance in the preparation of the Compliance Response Plan.

Comment #5:

The second sentence of Condition D.7.1 implies that VX agent will be release routinely from the chemical agent disposal facility. This is not the case as any potential emissions (VX and VOC) shall be controlled by carbon adsorption filter banks. The VX concentration (0.06 micrograms per cubic meter) is only used as a basis for calculating the VOC emissions. It is misleading and could result in unnecessary public concerns. The sentence should be deleted.

Response #5:

The sentence does not indicate whether the gas is released routinely or occasionally. It is included in Condition D.7.1 to assure that the VX concentration, when released, is below the concentration indicated (0.06 micrograms per cubic meter) and shall not harm any human or animals around the facility. Condition D.7.1 was revised, to clarify the requirement, as follows:

D.7.1 Volatile Organic Compounds (VOCs)

The CDB neutralization process shall process no more than 6 Tonne containers per day. The concentration of VX in the exhaust gas, **when emitting to the atmosphere**, shall be limited to 0.06 micrograms per cubic meter. This operating limit shall limit total volatile organic compound (VOC) emissions from the CDB process to 1.36 tons per twelve (12) month period rolled on a monthly basis.

Comment #6:

The SCWO hydrolysate feed rate listed in item (j) of Section A.2 and the Section D.8 equipment list, as well as condition D.8.1 should be 50,202 pounds per day of hydrolysate feed, not 50 and 202 pounds per day of hydrolysate feed, respectively. Also, the SCWO is a thermal oxidizing unit not a catalytic oxidizer.

Response #6:

Item (j) of Section A.2 and the Section D.8 equipment list has been revised as follows:

- (j) Two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal ~~and Catalytic~~ Oxidizers, rated at ~~50 and 202 pounds per day of hydrolysate feed, respectively~~ **50,202 pounds per day of hydrolysate feed**, and exhausting to one (1) stack identified as S/V 77, with air emissions controlled by carbon filters.

Additionally, Condition D.8.1 has been revised as follows:

D.8.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

The input to ~~each of the two (2) SCWO reactors shall not exceed 50 and 202 pounds per day of hydrolysate feed, respectively~~ **50,202 pounds per day of hydrolysate feed**. This operating limit shall limit total SO₂, VOC, CO and NOx emissions from the SCWO to 13.97, 0.01, 1.93 and 4.78 tons per twelve (12) month period rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply.

Comment #7:

The SCWO operating temperatures listed in Condition D.8.2 of this permit are subject to revision as the testing of the facility progresses. The RCRA Permit application included an operating range of 1100 to 1300 degrees F, and a note appears elsewhere that the range was to be determined. Since submission of that document, additional research and testing have been conducted, however, final operating parameters are still being refined and must be tested and verified during the Demonstration Test. Newport Chemical Depot recommends that the air permit include a note that operating parameters for the SCWO will be developed and verified during the Demonstration and Shakedown Testing.

Response #7:

Condition D.8.2 states that "The SCWO shall operate with an average temperature of at least 1,200 °F and at a minimum of no less than 900 °F or the temperature established during the latest stack test." The Permittee is already given the option to establish the temperature range using the latest stack test results. Therefore, the condition will not be revised as a result of the comment.

Comment #8:

In Condition D.9.1, when referring to internal combustion (IC) engines, language excluding emissions from IC engines associated with mobile sources, such as, backhoes, bulldozers, and other construction equipment, should be included. Newport Chemical requests that such exclusion be added to the condition.

Response #8:

OAM agrees and Condition D.9.1 has been revised as follows:

D.9.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

During the construction of the NECDF, the emissions of SO₂, VOC, CO and NOx due to the operation of generators and internal combustion (IC) engines **(excluding mobile sources such as, backhoes, bulldozers, and other construction equipment)** related to the construction shall not exceed 1.92, 0.36, 3.23 and 3.09 tons per month, respectively. Once the construction of the new NECDF equipment has been completed, the limits for the construction activities under Condition D.9.1 will expire and NECDF can start operating. Therefore, the requirements of 326 IAC 2-7 do not apply.

On October 4, 1999, OAM received a letter from Mrs. Evelyn Brown of 1644 Hulman Way, Terre Haute, Indiana requesting for notices and results of all further proceedings relating to the Newport Chemical Depot's application for the chemical agent disposal facility. OAM shall provide Mrs. Evelyn Brown with all documents requested.

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name:	Newport Chemical Depot
Source Location:	Indiana State Road 63, Newport, Indiana, 47966-0121
County:	Vermillion
SIC Code:	9711
Operation Permit No.:	F165-5470-00003
Operation Permit Issuance Date:	December 11, 1996
Significant Revision No.:	SMF165-9659-00003
Permit Reviewer:	Richard A. Moore Jr.

The Office of Air Management (OAM) has reviewed applications from Newport Chemical Depot relating to the addition of the Newport Chemical Agent Disposal Facility (NECDF) and the revision to the existing source.

History

NECD was issued a Federally Enforceable State Operating Permit (FESOP) on December 11, 1996 relating to the operations necessary for maintaining a National Defense - Chemical Stockpile Storage site consisting mainly of internal combustion engines for electrical power generation.

On April 9, 1998, Newport Chemical Depot (NECD) submitted a letter requesting changes to the source's FESOP permit for the addition of the Newport Chemical Agent Disposal Facility (NECDF) which includes the installation of three (3) boilers, three (3) emergency generators, and one (1) CDB neutralization process. On July 20, 1999, NECD submitted a letter requesting the revision to the existing operation including one (1) non-emergency generator, eleven (11) pumps, five (5) internal combustion engines and various insignificant activities.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

Newport Chemical Agent Disposal Facility (NECDF)

- (a) Three (3) natural gas fired boilers, identified as EU Boiler 2401 A/B/C, each rated at 14.6 million (MM) British thermal units (Btu) per hour and using #2 fuel oil as a backup, each exhausting at one (1) stack identified as S/V 70, 71 and 72, respectively;
- (b) Three (3) emergency type generators:
 - (1) two (2) #2 fuel oil generators, each rated at 1,750 kW, each exhausting at one (1) stack identified as S/V 73 and 74, respectively;
 - (2) one (1) #2 fuel oil generator rated at 250 kW, exhausting at one (1) stack identified as S/V 75;

- (c) One (1) CDB neutralization process, identified as containing TCC Operations, Drained Agent Reactors, Hydrolysate and other Tanks, exhausting through one (1) stack identified as S/V 76, air emissions controlled by carbon filters and hydrolysate treated by the SCWO listed in (d);
- (d) Two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal and Catalytic Oxidizers, rated at 50, and 202 pounds per day of hydrolysate feed, respectively, and exhausting to one (1) stack identified as S/V 77;
- (e) The pollutant emitting activities related to the construction of the NECDF are as follows:
 - (1) operation of generators;
 - (2) operation of internal combustion (IC) engines; and
 - (3) miscellaneous construction related fugitive and non-fugitive insignificant activities.

Existing Operation

- (f) One (1) non-emergency type gasoline generator, located in Building 718A and rated at 5 kilowatts (kW):
- (g) Eleven (11) gasoline pumps (internal combustion engines):
 - (1) three (3) pumps, located in Building 733K and each rated at 20 horsepower (HP);
 - (2) one (1) pump, located in Building 717A and rated at 20 HP;
 - (3) one (1) pump, located in Building 718A and rated at 20 HP;
 - (4) one (1) pump, located in Building 718A and rated at 12 HP;
 - (5) one (1) pump, located in Building 717A and rated at 10 HP;
 - (6) two (2) pumps, located in Building 718A and each rated at 8 HP;
 - (7) one (1) pump, located in Building 710 and rated at 7.5 HP; and
 - (8) one (1) pump, located in Building 725A and rated at 3 HP;
- (h) Five (5) maintenance units (internal combustion engines):
 - (1) three (3) gasoline fired engines, located in Building 718A and each rated at 5.5, 20 and 10 HP, respectively;
 - (2) one (1) diesel fired engine, located in Building 725A and rated at 65 HP; and
 - (3) one (1) gasoline fired engine, located in Building 725A and rated at 55 HP.

Insignificant Activities

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

Newport Chemical Agent Disposal Facility (NECDF)

- (a) Paved and unpaved roads and parking lots with public access;
- (b) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (c) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (d) On-site fire and emergency response training approved by the department;
- (e) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
 - (2) Diesel generators not exceeding 1600 horsepower;
 - (3) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower;
- (f) Stationary fire pumps;

- (g) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 tons per year of a single HAP;
- (h) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day of 2.5 tons per year of any combination of HAPs.

Existing Operation

- (i) Two (2) propane fired hot water heaters, each rated at 0.179 million British thermal units per hour (mmBtu/hr); and
- (j) One (1) diesel generator and one (1) air compressor, each rated at 5 HP.

Existing Approvals

The source was issued a FESOP (F165-5470-00003) on December 11, 1996. The source has since received the following:

- (a) CP 165-6361-00003, issued on September 19, 1996.
- (b) First Significant Revision to the existing FESOP source, SMF-165-9701-00003, issued on October 7, 1998.
- (c) First Minor Revision to the existing FESOP source, MMF-165-10289-00003, issued on April 23, 1999.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the carbon filters be considered as an integral part of the NECDF:

The NECDF is a process to destroy VX that is stored in one Tonne containers (this type of container is named after its inventor). Due to the nature of the initial chemical being handled, the carbon filters are built in the VX handling equipment to provide an additional level of emission reduction from the process and are an integral part of the entire design of the NECDF.

IDEM, OAM has evaluated the justifications and agreed that the carbon filters will be considered as an integral part of the NECDF. Therefore, the permitting level will be determined using the potential to emit after the carbon filters. Operating conditions in the proposed permit will specify that these carbon filters shall operate at all times when the NECDF is in operation.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
70, 71, 72	Boilers 2401 A/B/C	53	1.67	4,208	325
73,74	SDG A/B	30	0.67	5,235	925
75	SDG ECF	20	0.67	800	680
76	TCC Operation, Drained Agent Reactors, Hydrolysate and Other Tanks	100	6	96,000	70
77	SCWO Reactor	30	2.5	7,800	80

Enforcement Issue

There are no enforcement action pending.

Recommendation

The staff recommends to the Commissioner that the modification be approved.

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant. Additional information was received on May 1, 1998, May 14, 1998, May 18, 1998, August 19, 1998, April 14, 1999, June 1, 1999, June 7, 1999 and July 20, 1999.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document pages A1 through A3.

Potential To Emit of Revision

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

This table reflects the PTE before controls for the equipment covered under this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	21.8
PM-10	21.8
SO ₂	109.5
VOC	490.0
CO	175.5
NO _x	371.5
HAPS	0.0

- (a) The potential emissions before control of SO₂, VOC, CO and NO_x are each greater than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 2-8-12, a Significant Revision to the Federally Enforceable State Operating Permit (FESOP) is required.

Federal / State Rule Applicability

- (a) The three (3) 14.6 MMBtu/hr boilers 2401 A/B/C are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc). Pursuant to 40 CFR 60.42c(d), Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):
- (1) The SO₂ emissions from the refinery boiler combusting fuel oil shall not exceed five tenths (0.5) pounds per million Btu heat input; or
 - (2) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight.

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

The Permittee shall demonstrate compliance utilizing one of the following options:

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

The source will comply with this rule by using No. 2 distillate fuel oil with a sulfur content of 0.5% or less in the refinery boiler.

The Permittee shall keep monthly records and submit quarterly reports as required under 40 CFR 60.48c(d), including the following information:

- (1) Calendar dates covered in the reporting period;
- (2) Each 30-day average SO₂ emission rate (lb/MMBtu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
- (3) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), or (3) of 40 CFR 60.48c, as applicable.

The Permittee shall record and maintain records of the amounts of each fuel combusted in the refinery boiler during each month.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (c) 326 IAC 2-8-4 (FESOP)
This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions apply:
 - (1) The operation of the two (2) 1,750 kW diesel generators (S/V 73 and 74), and the one (1) 250 kW diesel generator (S/V 75) are each limited to 500 hours per twelve (12) month period, rolled on a monthly basis.
 - (2) The operation of the 5kW gasoline generator located in Building 718A, is limited to 360 hours per twelve (12) month period, rolled on a monthly basis.
 - (3) The operation of the eleven (11) gasoline pumps (IC engines) located in Buildings 710, 717A, 718A and 725A, is each limited to 180 hours per twelve (12) month period, rolled on a monthly basis.
 - (4) The operation of the five (5) IC engines as maintenance units located in Buildings 718A and 725A, is each limited to 180 hours per twelve (12) month period, rolled

on a monthly basis.

By accepting the above limitations the source wide sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen oxide (NO_x) and VOC emissions are limited to 28.33, 59.85, 70.33 and 46.12 tons per year, respectively, therefore the source satisfies the requirements of 326 IAC 2-8 (FESOP) and is not subject to the requirements of 326 IAC 2-7.

- (e) During the construction of the NECDF, the listed NECDF significant activities will not be operating. The emissions from non-fugitive activities related to the NECDF construction will be limited to the significant activity emission limitations allowed for the NECDF. Once the construction of the new NECDF equipment has been completed, the FESOP limits for the construction activities will expire and NECDF can start operating. Therefore, the source will satisfy the requirements of 326 IAC 2-8 (FESOP) and is not subject to the requirements of 326 IAC 2-7.
- (f) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The three 14.6 million (MM) Btu/hr boilers are subject to 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). These facilities will be constructed after September 21, 1983 and are subject to the emission limitation at 326 IAC 6-2-4 which is determined by formula.

$Pt = 1.09/Q^{0.26}$ where Q is the source wide operating capacity, including the existing operating capacity of 2.51 MMBtu/hr before adding the three 14.6 MMBtu/hr boilers

$$\begin{aligned} Pt &= 1.09 / (14.6*3+2.51)^{0.26} \\ &= 1.09 / 2.710662 = 0.402 \text{ pounds/MMBtu} \end{aligned}$$

Pursuant to this rule, the particulate matter (PM) emissions shall be limited to 0.402 pounds per million Btu heat input.

Compliance Calculation:

Potential PM Emissions after Control = 1.92 tons/yr (see Appendix A: Emission Calculations)

$$\begin{aligned} &= (1.92 \text{ tons PM/yr}) * (2,000 \text{ lbs/ton}) * (1 \text{ year}/8,760 \text{ hours}) * (1 \text{ hour}/46.31 \text{ MMBtu}) \\ &= 0.00947 \text{ lbs PM/MMBtu} \end{aligned}$$

Potential pounds of particulate matter per million Btu of heat input (0.0097 lbs/MMBtu) is less than the allowable rate of 0.402 lbs/MMBtu, therefore, the three 14.6 MMBtu/hr boilers will comply with the requirements under 326 IAC 6-2-4.

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

The sulfur dioxide emissions from the three (3) 14.6 MMBtu/hr boilers burning No. 2 distillate fuel oil shall be limited to 0.5 lb/MMBtu heat input. This equates to a distillate fuel oil sulfur content limit of 0.5%. Therefore, the sulfur content of the distillate fuel must be less than or equal to 0.5% in order to comply with this rule (See Appendix A, Page 3 of 4 for detailed calculations). The source will comply with this rule by using No. 2 distillate fuel oil with a sulfur content of 0.5% or less in the refinery boiler.

Proposed Changes to Federally Enforceable State Operating Permit:

The following changes were agreed to and made as the Second Significant Modification for this source (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

- (I) Condition A.2 "Emission Units and Pollution Control Summary" has been changed to list the new equipment and upon further review, the source has determined that the three diesel generators should be one diesel and two gasoline generators necessitating a change in (d) and subsequent renumbering of the units as follows:

A.2 Emission Units and Pollution Control Summary

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

- (a) twelve (12) non-emergency type generators:
- (1) four (4) diesel generators individually rated at 6 kilowatts (kW), each exhausting at one (1) stack identified as S/V 16, 17, 18, and 19;
 - (2) one (1) diesel generator rated at 155 kW, exhausting at one (1) stack identified as S/V 20;
 - (3) one (1) fire pump engine rated at 164.1 kW, exhausting at one (1) stack identified as S/V 27;
 - (4) one (1) gasoline generator rated at 3.5 kW, exhausting at one (1) stack identified as S/V 28;
 - (5) one (1) gasoline generator rated at 4 kW, exhausting at one (1) stack identified as S/V 29;
 - (6) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 33;
 - (7) one (1) propane generator rated at 35 kW, exhausting at one (1) stack identified as S/V 57;
 - (8) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 58; and
 - (9) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 59;
- (b) eleven (11) emergency type generators:
- (1) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 21;
 - (2) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 22;
 - (3) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 23;
 - (4) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 24;

- (5) one (1) diesel generator rated at 255 kW, exhausting at one (1) stack identified as S/V 25;
 - (6) two (2) gasoline generators individually rated at 4 kW, each exhausting at one (1) stack identified as S/V 30 and 34;
 - (7) one (1) propane generator rated at 11 kW, exhausting at one (1) stack identified as S/V 37;
 - (8) two (2) natural gas generators individually rated at 125 kW, each exhausting at one (1) stack identified as S/V 55 and S/V 56; and
 - (9) one (1) 941 PDS trailer rated at 25 kW, exhausting at one (1) stack identified as S/V 60;
- (c) One (1) TML wastewater incinerator rated at 500 pounds per hour and identified as EU 9, exhausting at one (1) stack identified as S/V 51;
- (d) ~~Three (3)~~ **One (1)** diesel-fired generators, identified as 63, 64 and 65, each with a maximum ~~rated heat input capacity of 67 horsepower (hp), 1.0 million British thermal units per hour (mmBtu/hr),~~ each exhausting to one (1) stack (~~S/V 63, 64, and 65~~);
- (e) **Two (2) gasoline-fired generators, identified as 64 and 65, each with maximum rated capacity of 9 horsepower (hp), each exhausting to one (1) stack (S/V 64 and 65, respectively);**
- ~~(e)~~(f) One (1) diesel-fired air compressor, identified as 66, with maximum heat input capacity of ~~1.0 million British thermal units per hour (mmBtu/hr)~~ **80 horsepower (hp)** exhausting to one (1) stack (66);
- (g) **Three (3) natural gas fired boilers, identified as EU Boiler 2401 A/B/C, each rated at 14.6 million (MM) British thermal units (Btu) per hour and using #2 fuel oil as a backup, each exhausting at one (1) stack identified as S/V 70, 71 and 72, respectively;**
- (h) **Three (3) emergency type generators:**
- (1) **two (2) #2 fuel oil generators, each rated at 1,750 kW, each exhausting at one (1) stack identified as S/V 73 and 74, respectively;**
 - (2) **one (1) #2 fuel oil generator rated at 250 kW, exhausting at one (1) stack identified as S/V 75;**
- (i) **One (1) CDB neutralization process, identified as containing TCC Operations, Drained Agent Reactors, Hydrolysate and other Tanks, exhausting through one (1) stack identified as S/V 76, with air emissions controlled by carbon filters and hydrolysate treated by the SCWO listed in (j); and**
- (j) **Two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal and Catalytic Oxidizers, rated at 50 and 202 pounds per day of hydrolysate feed, respectively, and exhausting to one (1) stack identified as S/V 77, with air emissions controlled by carbon filters.**

- (k) **The pollutant emitting activities related to the construction of the NECDF are as follows:**

 - (1) **operation of generators;**
 - (2) **operation of internal combustion (IC) engines; and**
 - (3) **miscellaneous construction related fugitive and non-fugitive insignificant activities.**

- (l) **One (1) non-emergency type gasoline generator, located in Building 718A and rated at 5 kilowatts (kW):**

- (m) **Eleven (11) gasoline pumps (internal combustion engines):**

 - (1) **three (3) pumps, located in Building 733K and each rated at 20 horsepower (HP);**
 - (2) **one (1) pump, located in Building 717A and rated at 20 HP;**
 - (3) **one (1) pump, located in Building 718A and rated at 20 HP;**
 - (4) **one (1) pump, located in Building 718A and rated at 12 HP;**
 - (5) **one (1) pump, located in Building 717A and rated at 10 HP;**
 - (6) **two (2) pumps, located in Building 718A and each rated at 8 HP;**
 - (7) **one (1) pump, located in Building 710 and rated at 7.5 HP; and**
 - (8) **one (1) pump, located in Building 725A and rated at 3 HP;**

- (n) **Five (5) maintenance units (internal combustion engines):**

 - (1) **three (3) gasoline fired engines, located in Building 718A and each rated at 5.5, 20 and 10 HP, respectively;**
 - (2) **one (1) diesel fired engine, located in Building 725A and rated at 65 HP; and**
 - (3) **one (1) gasoline fired engine, located in Building 725A and rated at 55 HP.**

- (II) **The following activities has been added to the Condition A.3 "Insignificant Activities" :**

 - (s) **Paved and unpaved roads and parking lots with public access;**

 - (t) **Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;**

 - (u) **Equipments used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;**

 - (v) **On-site fire and emergency response training approved by the department;**

 - (w) **Emergency generators as follows:**
 - (1) **Gasoline generators not exceeding 110 horsepower;**
 - (2) **Diesel generators not exceeding 1600 horsepower;**
 - (3) **Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower;**

 - (x) **Stationary fire pumps;**

- (y) **Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 tons per year of a single HAP;**
 - (z) **Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day of 2.5 tons per year of any combination of HAPs.**
 - (aa) **Two (2) propane fired hot water heaters, each rated at 0.179 million British thermal units per hour (mmBtu/hr); and**
 - (bb) **One (1) diesel generator and one (1) air compressor, each rated at 5 HP.**
- (III) A typographical error was found in Condition D.1.1, Carbon Monoxide located on page 23 of 30, is amended to the following (changes are bolded and crossed out for emphasis):
- The hours of o**~~Operations~~ of each non-emergency generator shall not exceed 360~~0~~ **hours** per twelve (12) consecutive months. The total **hours** for each month shall not exceed the difference between the annual limit minus the sum of the actual hours of operation from the previous eleven (11) months. Compliance is based on the total hours of operation during the previous 12 months. During the first twelve months of operation under this permit, the hours of operation shall be limited such that the total hours used divided by the accumulated months of operation shall not exceed 30~~0~~ hours per month. This operating limit shall limit the total carbon monoxide (CO) emissions from the non-emergency generators to ~~3.79~~ **3.77** tons per twelve (12) month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.
- Newport Chemical Depot (NECD) submitted several revision requests to the FESOP's original technical support document (165-5470), to the technical support document of the first significant revision (165-9701) and to the technical support document of the first minor revision (165-10289). The Office of Air Management (OAM) corrects errors in the permit in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAM's decision in a more detailed manner. This document is not an enforceable document, but an aid to the source's permit.
- (IV) The Limited Potential to Emit table, located on page 12 of 12 of the TSD, is amended to the following (changes are bolded and crossed out for emphasis):

Process/facility	Limited PTE (tons/yr)						
	PM	PM-10	SO2	VOC	CO	NOx	HAPs
Stationary Internal Combustion Engines	1.33	1.33	1.26 1.28	1.75 1.74	8.42 8.40	18.94 18.90	0.002
Building 7700 Boiler	0.16	0.08	3.32	0.03	0.39	1.56	0.00
Toxic Monitoring Lab Incinerator	0.17 0.00	0.17 0.00	0.01 0.00	0.07 0.00	0.29 0.00	1.38 0.00	5.27 0.00
Mobile Abrasive Blaster	25.81	7.04	0.00	0.00	0.00	0.00	0.00
Woodworking Shop	20.47	8.19	0.00	0.00	0.00	0.00	0.00
Surface Coating	8.68	8.68	0.00	14.77	0.00	0.00	8.88
Gasoline Dispensing Tank	0.00	0.00	0.00	8.91	0.00	0.00	4.41
Cold Cleaning Degreasers	0.00	0.00	0.00	2.32	0.00	0.00	0.00
Toxic Monitoring Lab	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Seven (7) Petroleum Storage Tanks	0.00	0.00	0.00	0.01	0.00	0.00	0.00
Insignificant Activities	0.65	0.65	0.02	0.18	0.73	3.40	0.0295
Trivial Activities	0.86	0.25	0.00	2.18	0.00	0.00	0.00
Non-Stock Pile Activities	0.52	0.52	0.59	1.01	10.42	7.37	0.00
New Agent Disposal Facility							
Boiler 2401	1.92	1.92	3.85	1.92	30.76	13.46	0.00
SDG A/B	0.86	0.86	5.00	0.79	5.50	16.14	0.00
SDG ECF	0.19	0.19	0.18	0.22	0.59	2.74	0.00
TCC Operation, Drained Agent Reactors, Hydrolysate and Other Tanks	0.00	0.00	0.00	1.36	0.00	0.00	0.00
SCWO Reactor	0.00	0.00	13.97	0.01	1.93	4.78	0.00
Revision to the Existing Operation							
Gasoline Generator in Bldg. 718A	0.00	0.00	0.00	0.03	0.53	0.01	0.00
11 pumps (IC engines)	0.01	0.01	0.01	6.00	0.29	0.15	0.00
5 maintenance units (IC engines)	0.02	0.02	0.02	3.61	0.19	0.27	0.00
Insignificant Activities	0.10	0.10	0.09	0.29	0.11	1.36	0.00
Total Emissions	60.04 61.59	28.3 29.85	6.43 28.33	32.49 46.12	15.74 59.85	52.84 70.33	18.59 13.99

- (V) Sections D.5, D.6, D.7, D.8, D.9 and D.10 are added as follows to incorporate the new units:

SECTION D.5 FACILITY OPERATION CONDITIONS

- (g) Three (3) natural gas fired boilers, identified as EU Boiler 2401 A/B/C, each rated at 14.6 million (MM) British thermal units (Btu) per hour and using #2 fuel oil as a backup, each exhausting at one (1) stack identified as S/V 70, 71 and 72, respectively;

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

D.5.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from all facilities used for indirect heating purposes which were constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per million Btu heat input

Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Note: This information is a confidential trade secret.

Based on the above equation, particulate matter emissions from the three boilers shall each be limited to 0.402 pounds of particulate matter per million British thermal units heat input.

D.5.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from each of the 14.6 MMBtu per hour boilers shall not exceed five tenths (0.5) pounds per million Btu heat input when burning fuel oil.
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

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

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limitations specified in Condition D.5.1 and/or the sulfur dioxide limitations specified in Condition D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.4 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

- (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
- (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

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

D.5.5 Visible Emissions Notations

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

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

D.5.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

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

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

- (b) To document compliance with Condition D.5.5, the Permittee shall maintain records of visible emission notations of the three boiler stack exhausts once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.1 and D.5.2 in any compliance period when No. 2 fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The following Natural Gas Fired Boiler Certification has been added to the permit.

COMPLIANCE DATA SECTION

NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0121
Mailing Address: P. O. Box 121, Newport, Indiana 47966-0121
Significant Revision No.: SSM 165-9659-00003

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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:

SECTION D.6 FACILITY OPERATION CONDITIONS

- (h) Three (3) emergency type generators:
- (1) two (2) #2 fuel oil generators, each rated at 1,750 kW, each exhausting at one (1) stack identified as S/V 73 and 74, respectively;
 - (2) one (1) #2 fuel oil generator rated at 250 kW, exhausting at one (1) stack identified as S/V 75;

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

D.6.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

Operation of each emergency generator shall not exceed 500 hours per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual hours of operation from the previous eleven (11) months. Compliance is based on the total hours of operation during the previous 12 months. During the first 12 months of operation under this permit, the hours of operation shall be limited such that the total hours used divided by the accumulated months of operation shall not exceed 41.5 hours per month. This operating limit shall limit total sulfur dioxide (SO₂), volatile organic compounds (VOC), carbon monoxide (CO) and nitrogen oxides (NO_x) emissions from the three (3) emergency generators to 5.18, 1.01, 6.09 and 18.88 tons per twelve (12) month period rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply.

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

D.6.2 Hours of Emergency Generator Operation

The Permittee shall maintain records at the source of the hours of operation for each emergency generator. The records shall be complete and sufficient to establish compliance with the hours of usage limits and/or CO and NO_x emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The hours of operation for each month of emergency generator usage; and
- (b) The 12 month rolling total of hours of operation for each emergency generator.

D.6.3 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.6.1 shall be submitted, to the address listed in Section C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

The following quarterly report has been added to the permit as follows to record the hours of operation of the three (3) diesel-fired generators and the one (1) diesel-fired air compressor.

FESOP Quarterly Report

Source Name: Newport Chemical Depot
 Source Address: Indiana State Road 63, Newport, Indiana 47966-0121
 Mailing Address: P.O. Box 121, Newport, Indiana 47966-0121
 FESOP No.: F165-5470-00003
 Facility: Three (3) diesel-fired generators
 Parameter: SO₂, VOC, CO and NO_x
 Limit: 500 hours of operation for each generator or compressor

YEAR: _____

Month	Equipment	Column 2	Column 3	Column 2 + Column 3
		Hours of Operation This Month	Hours of Operation Previous 11 Months	Hours of Operation 12 Month Total
	Generator (73)			
	Generator (74)			
	Generator (75)			
	Generator (73)			
	Generator (74)			
	Generator (75)			
	Generator (73)			
	Generator (74)			
	Generator (75)			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

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

SECTION D.7 FACILITY OPERATION CONDITIONS

- (i) One (1) CDB neutralization process, identified as containing TCC Operations, Drained Agent Reactors, Hydrolysate and other Tanks, exhausting through one (1) stack identified as S/V 76, with air emissions controlled by carbon filters and hydrolysate treated by the SCWO listed in (j)

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

D.7.1 Volatile Organic Compounds (VOCs)

The CDB neutralization process shall process no more than 6 Tonne containers per day. The concentration of VX in the exhaust gas shall be limited to 0.06 micrograms per cubic meter. This operating limit shall limit total volatile organic compound (VOC) emissions from the CDB process to 1.36 tons per twelve (12) month period rolled on a monthly basis.

Compliance Determination Requirements

D.7.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.7.3 Carbon Adsorption Filters - Operation

As required by operation condition C.6(b), the carbon adsorption filter banks, which are considered to be the integral part of the neutralization CDB process, shall be operated at all times when Tonne containers are being processed.

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

D.7.4 Daily Visible Checks for Leaks

- (a) Daily checks for leaks during CDB operations shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any detected leaks and the date of such leaks.
- (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, checks shall be taken during that part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
- (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 liquid leaks for that specific process.
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when a liquid leak is observed.

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

D.7.5 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.7.1.
- (1) The amount of Tonne containers processed each day; and
 - (2) A log of the dates of operation.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.8 FACILITY OPERATION CONDITIONS

- (j) Two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal and Catalytic Oxidizers, rated at 50 and 202 pounds per day of hydrolysate feed, respectively, and exhausting to one (1) stack identified as S/V 77, with air emissions controlled by carbon filters.

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

D.8.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

The input to each of the two (2) SCWO reactors shall not exceed 50,202 pounds per day of hydrolysate feed. This operating limit shall limit total SO₂, VOC, CO and NO_x emissions from the SCWO to 13.97, 0.01, 1.93 and 4.78 tons per twelve (12) month period rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply.

Compliance Determination Requirements

D.8.2 Minimum Operating Temperature

The SCWO shall operate with an average temperature of at least 1,200 °F and at a minimum of no less than 900 °F or the temperature established during the latest stack test. Operation at or above this minimum temperature ensures compliance with the destruction efficiency required for correct operation of the SCWO and with the emission limitations of Condition D.8.1.

D.8.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the SO₂, VOC, CO and NO_x limits specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.8.4 Carbon Adsorption Filters - Operation

As required by operation condition C.6(b), the carbon adsorption filter banks, which are considered to be the integral part of the SCWO process shall be operated at all times when hydrolysate is being processed.

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

D.8.5 Daily Visible Checks for Leaks

- (a) Daily checks for leaks during SCWO operations shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any detected leaks and the date of such leaks.
- (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, checks shall be taken during that part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
- (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 liquid leaks for that specific process.

- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when a liquid leak is observed.

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

D.8.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.8.1 and D.8.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.8.1 and D.8.2.
 - (1) The amount of hydrolysate processed each day;
 - (2) A log of the dates of operation;
 - (3) The minimum operating temperature in °F; and
 - (4) The average operating temperature in °F.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.8.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.8.1 and D.8.2 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.9 FACILITY OPERATION CONDITIONS

- (k) The pollutant emitting activities related to the construction of the NECDF are as follows:
- (1) operation of generators;
 - (2) operation of internal combustion (IC) engines; and
 - (3) miscellaneous construction related fugitive and non-fugitive insignificant activities.

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

D.9.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

During the construction of the NECDF, the emissions of SO₂, VOC, CO and NO_x due to the operation of generators and internal combustion (IC) engines related to the construction shall not exceed 1.92, 0.36, 3.23 and 3.09 tons per month, respectively. Once the construction of the new NECDF equipment has been completed, the limits for the construction activities under Condition D.9.1 will expire and NECDF can start operating. Therefore, the requirements of 326 IAC 2-7 do not apply.

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

D.9.2 Hours of Emergency Generator Operation

The Permittee shall maintain records at the source of the hours of operation and the type of fuel used for each generator and internal combustion (IC) engine related to the construction of the NECDF. The records shall be complete and sufficient to establish compliance with the SO₂, VOC, CO and NO_x emission limits established in D.9.1. The records shall contain a minimum of the following:

- (a) The hours of operation for each month for each generator and internal combustion (IC) engine related to the construction of the NECDF;
- (b) The type of fuel used for each generator and internal combustion (IC) engine related to the construction of the NECDF; and
- (c) The monthly SO₂, VOC, CO and NO_x emissions, calculated by using emission factors for generators and IC engines provided in Chapter 3 of the most recent edition of USEPA's AP-42.

D.9.3 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.9.1 shall be submitted, to the address listed in Section C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

The following quarterly report has been added to the permit as follows to record the hours of operation of the three (3) diesel-fired generators and the one (1) diesel-fired air compressor.

FESOP Quarterly Report

Source Name: Newport Chemical Depot
 Source Address: Indiana State Road 63, Newport, Indiana 47966-0121
 Mailing Address: P.O. Box 121, Newport, Indiana 47966-0121
 FESOP No.: F165-5470-00003
 Facility: Generators and internal combustion (IC) engines related to the construction of the NECDF
 Parameter: SO₂, VOC, CO and NO_x
 Limit: SO₂ - 1.92 tons per month; VOC - 0.36 tons per month
 CO - 3.23 tons per month; NO_x - 3.09 tons per month
 (Emissions shall be determined by using emission factors for generators and IC engines provided in Chapter 3 of the most recent edition of USEPA's AP-42)

YEAR: _____

Month	Equipment	Hours of Operation This Month	Type of Fuel Used	Emissions (tons/month)			
				SO ₂	VOC	CO	NO _x
	Generators						
	IC Engines						
	Generators						
	IC Engines						
	Generators						
	IC Engines						

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

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

SECTION D.10 FACILITY OPERATION CONDITIONS

- | | |
|-----|--|
| (l) | One (1) non-emergency type gasoline generator, located in Building 718A and rated at 5 kilowatts (kW): |
| (m) | Eleven (11) gasoline pumps (internal combustion engines):
(1) three (3) pumps, located in Building 733K and each rated at 20 horsepower (HP);
(2) one (1) pump, located in Building 717A and rated at 20 HP;
(3) one (1) pump, located in Building 718A and rated at 20 HP;
(4) one (1) pump, located in Building 718A and rated at 12 HP;
(5) one (1) pump, located in Building 717A and rated at 10 HP;
(6) two (2) pumps, located in Building 718A and each rated at 8 HP;
(7) one (1) pump, located in Building 710 and rated at 7.5 HP; and
(8) one (1) pump, located in Building 725A and rated at 3 HP; |
| (n) | Five (5) maintenance units (internal combustion engines):
(1) three (3) gasoline fired engines, located in Building 718A and each rated at 5.5, 20 and 10 HP, respectively;
(2) one (1) diesel fired engine, located in Building 725A and rated at 65 HP; and
(3) one (1) gasoline fired engine, located in Building 725A and rated at 55 HP. |

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

D.10.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides

Operation of the gasoline generator shall not exceed 360 hours per twelve (12) consecutive months and operation of the sixteen (16) internal combustion engines shall not exceed 180 hours per twelve (12) consecutive months each. The total for each month shall not exceed the difference between the annual limit minus the sum of actual hours of operation from the previous eleven (11) months. Compliance is based on the total hours of operation during the previous 12 months. During the first 12 months of operation under this permit, the hours of operation shall be limited such that the total hours used divided by the accumulated months of operation shall not exceed 30 hours per month for the gasoline generator and 15 hours per month for each of the sixteen (16) internal combustion engines. These operating limits shall limit total SO₂, VOC, CO and NO_x emissions from the gasoline generator and the sixteen (16) internal combustion engines to 0.03, 9.64, 1.01 and 0.43 tons per twelve (12) month period rolled on a monthly basis, respectively (emissions are calculated by using the emission factors for generators and IC engines provided in Chapter 3 of the most recent edition of USEPA's AP-42). Therefore, the requirements of 326 IAC 2-7 do not apply.

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

D.10.2 Hours of Gasoline Generator and IC Engine

The Permittee shall maintain records at the source of the hours of operation for the gasoline generator and the sixteen (16) internal combustion engines. The records shall be complete and sufficient to establish compliance with the hours of usage limits and/or SO₂, VOC, CO and NO_x emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The hours of operation for each month of the gasoline generator and the sixteen (16) internal combustion engines usage; and
- (b) The 12 month rolling total of hours of operation for each of the gasoline generator and the sixteen (16) internal combustion engines.

D.10.3 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.10.1 shall be submitted, to the address listed in Section C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

The following quarterly report has been added to the permit as follows to record the hours of operation of the gasoline generator and the sixteen (16) internal combustion engines.

FESOP Quarterly Report

Source Name: Newport Chemical Depot
 Source Address: Indiana State Road 63, Newport, Indiana 47966-0121
 Mailing Address: P.O. Box 121, Newport, Indiana 47966-0121
 FESOP No.: F165-5470-00003
 Facility: The gasoline generator in Building 718A and the sixteen (16) internal combustion engines in Buildings 710, 717A, 718A, 725A and 733K
 Parameter: SO₂, VOC, CO and NO_x
 Limit: 360 hours of operation per twelve (12) month period for the gasoline generator, 180 hours of operation per twelve (12) month period for the sixteen (16) internal combustion engines.

YEAR: _____

Bldg.	Unit ID.	Month: _____			Month: _____			Month: _____		
		Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot
718A	Gas. Gen. (5 kW)									
733K	20 hp pump-#1									
733K	20 hp pump-#2									
733K	20 hp pump-#3									
717A	20 hp pump									
718A	20 hp pump									
718A	12 hp pump									
717A	10 hp pump									
718A	8 hp pump									
710	7.5 hp pump									
725A	3 hp pump									
718A	5.5 hp maint. unit									
718A	20 hp maint. unit									
718A	10 hp maint. unit									
725A	65 hp maint. unit									
725A	55 hp maint. unit									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

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

Air Toxic Emissions

- (a) The modification will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendment.
- (b) See Attached calculations for detailed air toxic calculations.

Conclusion

The modifications of this source will be subject to the conditions of the attached proposed **Significant FESOP Revision Permit No. SMF-165-9659-00003**.

(SOURCE WIDE SUMMARY)
Newport Chemical Depot (NECD)
 Indiana State Road 63, Newport, Indiana, 47966-0121
 F165-5470-00003
 Richard A. Moore Jr.
 Revised - Limited Emissions (Modified 7/99)

SOURCE DESCRIPTION CATEGORY	S/V ID	Pollutants (tons/yr)						
		PM	PM10	SO2	VOC	CO	NOX	HAPS
		A	A	A	A	A	A	A

NECD

Non-emergency Generators Limited to 360 hours per year

4 - 6 kW Diesel Gen	16-19	0.01	0.01	0.01	0.01	0.04	0.18	0
155 kW Diesel Gen	20	0.08	0.08	0.08	0.09	0.25	1.16	0
164.1 kW Fire Pump	27	0.09	0.09	0.08	0.1	0.26	1.22	0
3.5 kW Gaso Gen	28	6.00E-04	6.00E-04	5.00E-04	0.02	0.37	0.01	0
4 kW Gaso Gen	29	7.00E-04	7.00E-04	6.00E-04	0.02	0.42	0.01	0
7.5 kW Gaso Gen	33	1.30E-03	1.30E-03	1.10E-03	0.04	0.79	0.02	0
7.5 kW Gaso Gen	58	1.30E-03	1.30E-03	1.10E-03	0.04	0.79	0.02	0
7.5 kW Gaso Gen	59	1.30E-03	1.30E-03	2.58E-02	0.04	0.79	0.02	0
35 kW Propane Gen	57	0.02	0.02	0.02	0.02	0.06	0.26	0
subtotal, lbs/yr		416.4	416.4	442.2	760	7538	5800	0
Subtotal, TPY		0.2082	0.2082	0.2211	0.38	3.769	2.9	0

Emergency Generators Limited to 500 hour per year

250 kW Diesel Gen	21	0.18	0.18	0.17	0.21	0.56	2.59	0
250 kW Diesel Gen	22	0.18	0.18	0.17	0.21	0.56	2.59	0
250 kW Diesel Gen	23	0.18	0.18	0.17	0.21	0.56	2.59	0
250 kW Diesel Gen	24	0.18	0.18	0.17	0.21	0.56	2.59	0
255 kW Diesel Gen	25	0.19	0.19	0.18	0.22	0.57	2.64	0
4 kW Gaso Gen	30	1.00E-03	1.00E-03	8.00E-04	0.03	0.59	0.02	0
11 kW Propane Gen	37	8.10E-03	8.10E-03	7.60E-03	9.30E-03	2.46E-02	1.14E-01	0
125 kW Nat Gas Gen	55	0.0923	0.0923	0.0861	0.1054	0.2797	1.2952	0
125 kW Nat Gas Gen	56	0.0923	0.0923	0.0861	0.1054	0.2797	1.2952	0
4 kW Gaso Gen	34	1.00E-03	1.00E-03	8.00E-04	0.03	0.59	0.02	0
25 kW PDS trailer	60	0.02	0.02	0.02	0.02	0.06	0.26	0
subtotal, lbs/yr		2249.4	2249.4	2122.8	2720.2	9268	32008.8	0
Subtotal, TPY		1.1247	1.1247	1.0614	1.3601	4.634	16.0044	0

Generator Subtotal, lbs/yr		2665.8	2665.8	2565	3480.2	16806	37808.8	0
Subtotal, TPY		1.3329	1.3329	1.2825	1.7401	8.403	18.9044	0

TML Lab Incinerator	51	0	0	0	0	0	0	0
subtotal, lbs/yr		0	0	0	0	0	0	0
Subtotal, TPY		0	0	0	0	0	0	0

Significant Subtotal (lb/yr)		2665.8	2665.8	2565	3480.2	16806	37808.8	0
Subtotal, TPY		1.33	1.33	1.28	1.74	8.40	18.90	0.00

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SOURCE DESCRIPTION CATEGORY	S/V ID	Pollutants (tons/yr)						
		PM	PM10	SO2	VOC	CO	NOX	HAPS
		A	A	A	A	A	A	A

NECD (Cont.)

Insignificant Activities

Bldg 7700 boiler (1)	7	0.16	0.08	3.32	0.03	0.39	1.56	0
Mobil Blaster (1)	U36	25.81	7.04	0	0	0	0	0
Woodworking (1)	10	20.47	8.19	0	0	0	0	0
Paint Booths (1)	9,12	8.68	8.68	0	14.77	0	0	8.88
Gas Pump & Tank 12 (1)	13,14	0	0	0	8.91	0	0	4.41
2 Degreasers (1)	53	0	0	0	1.16	0	0	0
2 Degreasers (1)	54	0	0	0	1.16	0	0	0
TML Lab Usage (1)	38	0	0	0	0.03	0	0	0.01
Tank 1 Diesel (1)	40	0	0	0	0.0004	0	0	0.000
Tank 2 Diesel (1)	41	0	0	0	0.0005	0	0	0.000
Tank 3 Diesel (1)	42	0	0	0	0.0004	0	0	0.000
Tank 4 Diesel (1)	43	0	0	0	0.0004	0	0	0.000
Tank 10 #2 (1)	50	0	0	0	0.0004	0	0	0.000
All Boilers, x 7700		0.65	0.65	0.02	0.18	0.73	3.4	0.024
10,000 gallon Diesel		0	0	0	0.0066	0	0	0.001
Wastewater		0	0	0	0.6232	0	0	0.004
Asbestos		0	0	0	0	0	0	0
Fire Training		0	0	0	0.0011	0.01	0	0.000
Medical Laboratory		0	0	0	0.0584	0	0	0
Combustion Startup		0	0	0	0.0001	0	0	0

Insignificant Subtotal, lbs/yr	111540	49280	6680	53863	2260	9920	26660
Subtotal, TPY	55.77	24.64	3.34	26.93	1.13	4.96	13.33

Trivial Activities

A/C Refrig, Fire Sup	0	0	0	0	0	0	0.658
Fixed Abrasive Blaster	0.84	0.23	0	0	0	0	0
Welding	0.02	0.02	0	0	0	0	0
Protective Mask Clean	0	0	0	0.0196	0	0	0
Weapons Cleaning	0	0	0	0.1289	0	0	0
Misc Chemical Use	0	0	0	0.6125	0	0	0
Structural Painting	0	0	0	0.5505	0	0	0
Pesticides/Herbicides	0	0	0	0.8641	0	0	0

Trivial Subtotal	1720	500	0	4351.2	0	0	1316
Subtotal, TPY	0.86	0.25	0.00	2.18	0.00	0.00	0.66

Fugitive Emissions

Landfill	U28	0	0	0	1.3154	0	0	0.067
Storage piles raw	U37	0	0	0	0	0	0	0
Storage piles soil	U38	2.46	1.21	0	0	0	0	0
Road dust	U45	117	22.83	0	0	0	0	0
Firing range	U46	0	0	0	0	0	0	0.000
Prairie burns	U49	2.1	2.1	0	0	15.72	0	0
Tank 11 Propane	was U48 now propane U48	0	0	0	0	0	0	0

Fugitive Subtotal, lbs/yr	243120	52280	0	2630.8	31440	0	133.8
Subtotal, TPY	121.56	26.14	0.00	1.32	15.72	0.00	0.07

NECD Total, lbs/yr	359045.8	104725.8	9245	64325.2	50506	47728.8	28110
, TPY	179.5229	52.3629	4.6225	32.1626	25.253	23.8644	14.06
	179.52	52.36	4.62	32.16	25.25	23.86	14.06

NECD Total less Fugitive, lbs/yr	115925.8	52445.8	9245	61693.54	19066	47728.8	27976
, TPY	57.9629	26.2229	4.6225	30.84677	9.533	23.8644	13.99
	57.96	26.22	4.62	30.85	9.53	23.86	13.99

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		PM	PM10	SO2	VOC	CO	NOX	HAPS
		A	A	A	A	A	A	A

Non-Stock Pile

Diesel Generator #1 (67 hp) (50 kW)	Not As	0.23	0.23	0.214	0.262	0.698	3.24	
Generator (gas-fueled) (20 hp) (50,888.6 Btu/hr)	Not As	0.00216	0.00216	0.00177	0.0648	1.32	0.033	
Generator (gas-fueled) (20 hp) (50,888.6 Btu/hr)	Not As	0.00216	0.00216	0.00177	0.0648	1.32	0.033	
Welder (gasoline) (13 hp) (33,077.6 Btu/hr)	Not As	0.00141	0.00141	0.00115	0.0421	0.856	0.0215	
Welder (gasoline 16 hp) (40,710.9 Btu/hr)	Not As	0.00173	0.00173	0.00142	0.0518	1.05	0.0264	
Welder (gasoline)(8 Kw) (11hp)	Not As	0.00119	0.00119	0.000975	0.0356	0.724	0.0182	
Emer. Generator (gasoline) (6.8 Kw) (9 hp)	Not As	0.000973	0.000973	0.000798	0.0292	0.593	0.0149	
Emer. Generator (gasoline) (6.8 Kw) (9 hp)	Not As	0.000973	0.000973	0.000798	0.0292	0.593	0.0149	
Air Compressor (diesel) (80 bhp)	Not As	0.275	0.275	0.256	0.313	0.834	3.87	
Air compressor (gasoline) (10hp)	Not As	0.00108	0.00108	0.000887	0.0324	0.659	0.0165	
High -pressure washer (gasoline)(16 hp)	Not As	0.00288	0.00288	0.00236	0.0864	1.76	0.044	
High -pressure washer (diesel fired heater)(2.9hp)	Not As	0.00148	0.00148	0.0525	0.000252	0.0037	0.0074	
Portable heater, (kerosene) (1.4 gal/hr)	Not As	0.00042	0.00042	0.0149	0.000071	0.00105	0.0021	
Portable heater, (kerosene) (1.1 gal/hr)	Not As	0.00033	0.00033	0.0117	0.000056	0.000825	0.00165	
Portable heater, (kerosene) (1.2 gal/hr)	Not As	0.00036	0.00036	0.0128	0.000061	0.0009	0.0018	
Portable heater, (kerosene) (1.4 gal/hr)	Not As	0.00042	0.00042	0.0149	0.000071	0.00105	0.0021	
Propane heater (28,000 Btu/hr)	Not As	0.000083	0.000083	0.00001	0.000063	0.000396	0.00292	
Propane heater (95,000 Btu/hr)	Not As	0.000283	0.000283	0.000035	0.000212	0.00134	0.0099	
Propane heater (95,000 Btu/hr)	Not As	0.000283	0.000283	0.000035	0.000212	0.00134	0.0099	
Non-Stock Pile Total, lbs/yr		1046.431	1046.431	1177.618	2024.597	20835.2	14740.34	0
Subtotal, TPY		0.52	0.52	0.59	1.01	10.42	7.37	0.00

Emission Increase Due to the FESOP Revision

NECDF (New Agent Disposal Facility)

BOIL-2401 A/B/C-NG	Not As	1.54	1.54	1.54	1.54	23.07	7.69	
BOIL-2401 A/B/C-FO	Not As	0.38	0.38	2.31	0.38	7.69	5.77	
SDG-A/B	Not As	0.86	0.86	5	0.79	5.5	16.14	
SDG-ECF	Not As	0.19	0.19	0.18	0.22	0.59	2.74	
SCWO REACTOR	Not As	0	0	13.97	0.01	1.93	4.78	
TCC Operation	Not As	0	0	0	0.000091	0	0	
Drained Agent Reactors	Not As	0	0	0	0.18	0	0	
TCC Effluent Reactors	Not As	0	0	0	0.34	0	0	
Hydrolysate Tanks	Not As	0	0	0	0.04	0	0	
Total Tanks	Not As	0	0	0	0.8	0	0	
New NECDF Total, lbs/yr		5940	5940	46000	8600.183	77560	74240	0
Subtotal, TPY		2.97	2.97	23.00	4.30	38.78	37.12	0.00

Revision to the Existing Operation

Non-emergency Generators Limited to 360 hours per year

5kW Gaso Gen in Bldg. 718A 1969 9.00E-04 9.00E-04 0.00 0.03 0.53 0.01 0

Internal Combustion Engines Limited to 180 hour per year

11 pumps (totally 148.5 HP) 0.01 0.01 0.01 6.00 0.29 0.15 0.00
 5 Maintenance units (totally 155.5 HP) 0.02 0.02 0.02 3.61 0.19 0.27 0.00

Insignificant Activities

2 propane hot water heaters 0.006 0.006 0 0.024 0.006 0.18 0
 2 diesel IC engines (totally 10 HP) 0.096 0.096 0.09 0.292 0.11 1.358 0

Revision Total, lbs/yr	6199.8	6199.8	46229.4	28522.18	79802	78188	0
Subtotal, TPY	3.10	3.10	23.11	14.26	39.90	39.09	0.00

FACILITY TOTALS AFTER REVISION

Facility Grand Total w/ NECD Fugitives, lbs/yr	366292	111972	56652.02	94871.98	151143.2	140657.14	28110
Subtotal, TPY	183.15	55.99	28.33	47.44	75.57	70.33	14.06

Facility Grand Total w/ out NECD Fugitives, lbs/yr	123172	59692.03	56652.02	92240.32	119703.2	140657.14	27976
Subtotal, TPY	61.59	29.85	28.33	46.12	59.85	70.33	13.99

(1)This insignificant activity's emissions are individually listed in the April 1999 FESOP.