NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and Federally Enforceable State Operating Permit (FESOP) for Savage Services in Lake County

FESOP No.: F089-41538-00607

The Indiana Department of Environmental Management (IDEM) has received an application from Savage Services, located at 3600 Gibson Transfer Road, Hammond, IN 46323, for a new source construction and FESOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Savage Services to construct and operate a new natural gas liquid condensate, gasoline and fuel additive railcar transfer services source.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit regulated pollutants will be limited to less than the TV and/or PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

IDEM is aware that all equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Hammond Public Library
564 State St
Hammond, IN 46320-1532

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing,
IDEA will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F089-41538-00607 in all correspondence.

Comments should be sent to:

Mehul Sura  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Mehul Sura or (317) 233-6868  
Or dial directly: (317) 233-6868  
Fax: (317)-232-6749 attn: Mehul Sura  
E-mail: msura@IDEM.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Mehul Sura of my staff at the above address.

Madhurima D. Moulik, Ph.D., Section Chief  
Permits Branch  
Office of Air Quality
New Source Construction and Federally Enforceable
State Operating Permit
OFFICE OF AIR QUALITY

Savage Services
3600 Gibson Transfer Road
Hammond, Indiana 46323

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

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

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

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

The Permittee owns and operates a stationary natural gas liquid condensate, gasoline transfer and fuel additive railcar transfer services.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>3600 Gibson Transfer Road, Hammond, Indiana 46323</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(219) 781-5131</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>4789 (Transportation Services, Not Elsewhere Classified)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Lake</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Nonattainment for 8-hour ozone standard</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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

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

(a) One (1) liquid truck loading operation, identified as EU1, constructed in 2006, consisting of:

   (i) Natural gas liquid condensate transfer services, identified as EU1N, with a maximum throughput capacity of 8 rail cars per day, using submerged fill method and vapor recovery system for VOC control, and exhausting through vent.

   (ii) Gasoline transfer services, identified as EU1G, with a maximum throughput capacity of 16 rail cars per day, using submerged fill method and vapor recovery system for VOC control, and exhausting through vent.

(b) One (1) liquid truck loading operation, identified as EU4, constructed in 2006, consisting of fuel additives transfer services, with a maximum throughput capacity of 8 rail cars per day, voluntarily controlled by carbon adsorber CE-1 and exhausting through vent. The following fuel additives material transfer services are performed at EU4:

   Acetic Acid, Butane, Fuel Additives, Isooctane, Lube Oil, Coke Tar, Propylene Glycol, Wax and Base Oil and Wannate (MDI)

(c) One (1) solid loading operation, identified as EU3, constructed in 2006, with a maximum throughput capacity of 100 tons per hour, used for quicklime, sodium bicarbonate and other similar materials transfer from railcar to truck, controlled by baghouse CE-2 and exhausting to atmosphere.
(d) Unpaved roads

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

This stationary source also includes the following insignificant activities:

(a) One (1) natural gas-fired boiler, identified as EU2, constructed in 2006, with a maximum heat input capacity of 8.4 MMBtu/hr, without control and exhausting inside.

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

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

B.1 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4] [326 IAC 2-8]
This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.

(b) If actual construction of the emission units differs from the construction described in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]
(a) This permit, F089-41538-00607, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

1. it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

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

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
(c) The annual compliance certification report shall include the following:

1. The appropriate identification of each term or condition of this permit that is the basis of the certification;
2. The compliance status;
3. Whether compliance was continuous or intermittent;
4. The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
5. Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.
(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.
The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F089-41538-00607 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a
certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;
(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform
the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.24 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.
(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.2 Opacity  [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.
C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Particulate Matter Emissions [326 IAC 6.8-10-3]
Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

(a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).

(c) The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.

(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

(f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.

(g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(h) Material processing facilities shall include the following:

(1) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(2) The PM$_{10}$ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(3) The PM$_{10}$ stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(4) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.

(5) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).
(i) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(j) Material transfer limits shall be as follows:

   1. The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

   2. Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.

   3. Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:

      A. The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.

      B. The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).

(k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the attached Fugitive Dust Control Plan (included as Attachment A to the operating permit).

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

   1. When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

   2. If there is a change in the following:

      A. Asbestos removal or demolition start date;

      B. Removal or demolition contractor; or

      C. Waste disposal site.
(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require
a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements  [326 IAC 2-1.1-11]

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

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

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

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

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an
alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) liquid truck loading operation, identified as EU1, constructed in 2006, consisting of:

(i) Natural gas liquid condensate transfer services, identified as EU1N, with a maximum throughput capacity of 8 rail cars per day, using submerged fill method and vapor recovery system for VOC control, and exhausting through vent.

(ii) Gasoline transfer services, identified as EU1G, with a maximum throughput capacity of 16 rail cars per day, using submerged fill method and vapor recovery system for VOC control, and exhausting through vent.

(b) One (1) liquid truck loading operation, identified as EU4, constructed in 2006, consisting of fuel additives transfer services, with a maximum throughput capacity of 8 rail cars per day, voluntarily controlled by carbon adsorber CE-1 and exhausting through vent. The following fuel additives material transfer services are performed at EU4:

- Acetic Acid
- Butane
- Fuel Additives
- Isooctane
- Lube Oil
- Coke Tar
- Propylene Glycol
- Wax
- Base Oil
- Wannate (MDI)

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

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

D.1.1 PSD Minor, FESOP and VOC BACT avoidance Limits [326 IAC 2-3][326 IAC 2-8-4][326 IAC 8-1-6]

(a) In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-3 (Emission Offset) not applicable to the source, the Permittee shall comply with the following:

(1) The VOC emissions from EU1N (after control) shall not exceed 8.98 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) The VOC emissions from EU1G (after control) shall not exceed 26.24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-3 (Emission Offset) not applicable to the source and 326 IAC 8-1-6 BACT requirements not applicable EU4, the Permittee shall comply with the following:

(1) The VOC emissions from EU4 (before control) shall not exceed 18.69 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the VOC potential to emit from other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-3 (Emission Offset) not applicable.
Compliance with the Condition D.1.1(c) in conjunction with fugitive VOC emissions from EU4 shall limit the total VOC emissions before control from EU4 to less than 25 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 not applicable to EU4.

D.1.2 Best Available Control Technology (BACT) - VOC [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the Permittee shall control VOC emissions from EU1N using BACT, which has been determined to be the following:

(a) The VOC emissions from EU1N shall be controlled by submerged fill and vapor recovery control.

(b) The minimum overall VOC control efficiency (including collection efficiency and control efficiency) for the submerged fill and vapor recovery system shall be 95%.

(c) The VOC emissions from EU1N (after control) shall not exceed 8.98 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.3 Bulk gasoline terminals Requirements [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4 (Bulk gasoline terminals), the Permittee shall comply with the following for EU1G:

(a) The Permittee shall not allow loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

(1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:

   (A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 mg/l of VOC to the atmosphere.

   (B) An approved control system, demonstrated to have control efficiency equivalent to or greater than Condition D.1.3(a)(1)(A) above.

(2) Displaced vapors and gases are vented only to the vapor control system.

(3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

(b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

D.1.4 Gasoline transports Requirements [326 IAC 8-4-7]

Pursuant to 326 IAC 8-4-7 (Gasoline transports), the Permittee shall comply with the requirements of 326 IAC 8-4-7(a) through (e) (included as Attachment B to the operating permit) for EU1G.
D.1.5 Leaks from Transports and Vapor Collection Systems: Records [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9, the Permittee shall comply with the requirements of 326 IAC 8-4-7(a) through (i) (included as Attachment C to the operating permit) for EU1G.

D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan (PMP) is required for these facilities and its control devices. Section B - Preventative Maintenance Plan contains the Permittee’s obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to determine compliance with the Condition D.1.2(b), the Permittee shall perform overall VOC control efficiency testing on the vapor recovery system controlling EU1N no later than 180 days after the issuance of this FESOP No. F089-41538-00607.

(b) In order to verify the VOC limit specified in Condition D.1.4(a)(1), the Permittee shall perform overall VOC testing on the vapor recovery system controlling EU1G no later than 180 days after the issuance of this FESOP No. F089-41538-00607.

These test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration on the vapor recovery system. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures) and utilizing methods as approved by the commissioner. Section C - Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

D.1.8 VOC Emissions Determination

(a) In order to determine compliance with the Condition D.1.1(a)(1), the VOC emissions from EU1N shall be calculated each month using the following equation:

\[
\text{VOC} = 5.72 \times Q_N \times \left(1 - \left(\frac{E_f}{100}\right)\right) / (1000 \times 2000)
\]

Where:

\[
\begin{align*}
\text{VOC} &= \text{VOC emissions from EU1N (tons/month)} \\
5.72 &= \text{loading loss (lb/1000 gal), determined from the Loading Loss formula in AP-42, Chapter 5.2} \\
Q_N &= \text{natural gas liquid condensate loading during a given month (gallons/month)} \\
E_f &= \text{overall VOC control efficiency (%) of vapor recovery system equipped on EU1N, determined from the most recent stack test (until the stack test results are available, this value is equal to 95%)} \\
1000 &= \text{unit conversion (thousand gallons)} \\
2000 &= \text{unit conversion (pounds/ton)}
\end{align*}
\]

(b) In order to determine compliance with the Condition D.1.1(a)(2), the VOC emissions from EU1G shall be calculated each month using the following equation:

\[
\text{VOC} = R_G \times 3.79 \times Q_G / (1000 \times 453.5 \times 2000)
\]

Where:

\[
\begin{align*}
\text{VOC} &= \text{VOC emissions from EU1G (tons/month)} \\
R_G &= \text{VOC emission rate from EU1G, mg/liter of gasoline loading, determined from the most recent stack test (until the stack test results are available, this value is equal to 80 mg/liter of gasoline)}
\end{align*}
\]
\[ Q_G = \text{gasoline loading during a given month (gallons/month)} \]
\[ 3.79 = \text{unit conversion, liters/gallon} \]
\[ 1000 = \text{unit conversion, milligram/gram} \]
\[ 453.5 = \text{unit conversion, gram/pound} \]
\[ 2000 = \text{unit conversion (pounds/ton)} \]

(c) In order to determine compliance with the Condition D.1.1(b)(1), the VOC emissions from EU4 shall be calculated each month using the following equation:

\[
\text{VOC} = \sum_{i=1}^{n} \left( 12.46 \times S_i \times P_i \times M_i / T_i \right) \times \left( Q_i \right) / \left( 1000 \times 2000 \right)
\]

Where:

- \( \text{VOC} \) = total VOC emissions from EU4 (tons/month)
- \( 12.46 \) = value is based on Loading Loss formula from AP-42, Chapter 5.2
- \( S_i \) = saturation factor from AP-42, Chapter 5.2
- \( P_i \) = true vapor pressure (psia)
- \( M_i \) = molecular weight of vapors
- \( T_i \) = temperature of liquid, Rankine (°R)
- \( Q_i \) = material loading during a given month (gallons/month)
- \( 1000 \) = unit conversion (thousand gallons)
- \( 2000 \) = unit conversion (pounds/ton)

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

D.1.9 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1 and D.1.2(c), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.2(c). Records necessary to demonstrate compliance shall be available not later than 30 days after the end of each compliance period.

1. Gallons of each material loaded at EU1N, EU1G and EU4.
2. Saturation factors, true vapor pressure, molecular weight of vapors and temperature data of each material loaded at EU1N, EU1G and EU4.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to record keeping.

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2(c) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) One (1) solid loading operation, identified as EU3, constructed in 2006, with a maximum throughput capacity of 100 tons per hour, used for quicklime, sodium bicarbonate and other similar materials transfer from railcar to truck, controlled by baghouse CE-2 and exhausting to atmosphere.

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

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

D.2.1 Particulate Emissions [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a), particulate matter (PM) emissions from EU3 shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for this facility and any associated control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.2.3 Particulate Control

(a) In order to assure compliance with Condition D.2.1, the baghouse CE-2 for particulate control shall be in operation and control emissions from the EU3 at all times EU3 is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.4 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in EU3. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with
abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.5 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse CE-2 used in conjunction with EU3, at least once per day when EU3 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

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

D.2.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the pressure drop across the baghouse. The Permittee shall include in its daily record when the pressure drop across the baghouse is not taken and the reason for the pressure drop was not taken (e.g. the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.3     EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activity:

(a) One (1) natural gas-fired boiler, identified as EU2, constructed in 2006, with a maximum heat input capacity of 8.4 MMBtu/hr, without control and exhausting inside.

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

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

D.3.1 Particulate Emissions [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(b)(3), particulate matter (PM) emissions from the natural gas-fired boiler (EU2) shall not exceed 0.01 grains per dry standard cubic foot (dscf).

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- [ ] Annual Compliance Certification Letter
- [ ] Test Result (specify)__________________________
- [ ] Report (specify)______________________________
- [ ] Notification (specify)________________________
- [ ] Affidavit (specify)___________________________
- [ ] Other (specify)______________________________

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

Signature: ______________________________________

Printed Name: ____________________________________

Title/Position: _________________________________

Date: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Savage Services
Source Address: 3600 Gibson Transfer Road, Hammond, Indiana 46323
FESOP Permit No.: F089-41538-00607

This form consists of 2 pages

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
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<tr>
<th>Date/Time Emergency started:</th>
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<tr>
<td>Date/Time Emergency was corrected:</td>
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<td>Was the facility being properly operated at the time of the emergency?</td>
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<td>Describe:</td>
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<td>Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOx, CO, Pb, other:</td>
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<td>Estimated amount of pollutant(s) emitted during emergency:</td>
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<td>Describe the steps taken to mitigate the problem:</td>
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<td>Describe the corrective actions/response steps taken:</td>
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<td>Describe the measures taken to minimize emissions:</td>
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<tr>
<td>If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:</td>
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Form Completed by:______________________________
Title / Position:______________________________
Date:_______________________________________
Phone:______________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

FESOP Quarterly Report  

Source Name: Savage Services  
Source Address: 3600 Gibson Transfer Road, Hammond, Indiana 46323  
FESOP Permit No.: F089-41538-00607  
Facility: EU1N  
Parameter: VOC emissions  
Limit: 8.98 tons per twelve (12) consecutive month period with compliance determined at the end of each month.  

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

Submitted by: ____________________________  
Title / Position: ____________________________  
Signature: ____________________________  
Date: ____________________________  
Phone: ____________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FESOP Quarterly Report  

Source Name: Savage Services  
Source Address: 3600 Gibson Transfer Road, Hammond, Indiana 46323  
FESOP Permit No.: F089-41538-00607  
Facility: EU1G  
Parameter: VOC emissions  
Limit: 26.24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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- [ ] No deviation occurred in this quarter.
- [ ] Deviation/s occurred in this quarter.

Deviation has been reported on: ______________________________

Submitted by: ______________________________
Title / Position: ______________________________
Signature: ______________________________
Date: ______________________________
Phone: ______________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

FESOP Quarterly Report

Source Name: Savage Services  
Source Address: 3600 Gibson Transfer Road, Hammond, Indiana 46323  
FESOP Permit No.: F089-41538-00607  
Facility: EU4  
Parameter: Total VOC emissions before control  
Limit: 18.69 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Submitted by: ________________________________
Title / Position: ________________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

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<td>Probable Cause of Deviation:</td>
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<td>Number of Deviations:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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<td>Response Steps Taken:</td>
<td></td>
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</tbody>
</table>

Form Completed by: ____________________________
Title / Position: ____________________________
Date: ____________________________
Phone: ____________________________
Savage Services
3600 Gibson Transfer Road
Hammond, Indiana 46323

Affidavit of Construction

I, _____________________________, being duly sworn upon my oath, depose and say:

(Name of the Authorized Representative)

1. I live in __________________________ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of __________________________ for __________________________.
   (Title)           (Company Name)

3. By virtue of my position with __________________________, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of __________________________.
   (Company Name)

4. I hereby certify that Savage Services  3600 Gibson Transfer Road, Hammond, Indiana 46323, has constructed and will operate a natural gas liquid condensate, gasoline transfer and fuel additive railcar transfer services on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 4, 2019 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F089-41538-00607, Plant ID No. 089-00607 issued on __________

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature______________________________
Date______________________________

STATE OF INDIANA)
COUNTY OF __________________________ )

Subscribed and sworn to me, a notary public in and for __________________________ County and State of Indiana on this __________________________ day of __________________________, 20____, My Commission expires: ______________.

Signature______________________________
Name______________________________ (typed or printed)
### Table of Contents

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   2.2  **Applicable Operations (326 IAC 6.8-10-4(3)(B))**  

   2.3  **Description of Applicable Operations (326 IAC 6.8-10-4(3)(D))**  

   2.4  **Control Measures and Practices (326 IAC 6.8-10-4(3)(E) and (F))**

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**APPENDIX A — SITE MAP**
1.0  **Applicability**

Savage Services ("Savage") operates a material transloading facility located in Hammond, Lake County, IN. Lake County-specific fugitive particulate matter requirements are listed in 326 IAC 6.8-10. Savage is subject and must comply with these requirements, including the creation and implementation of a Fugitive Dust Control Plan (326 IAC 6.8-10-4).

2.0  **Fugitive Dust Control Plan Requirements (326 IAC 6.8-10-4(3))**

2.1  **Source and Location (326 IAC 6.8-10-4(3)(A))**

Name and Address of Source:
Savage Services
3600 Gibson Transfer Road
Hammond, IN 46323

Name and Address of Source Owner:
Savage Services
901 West Legacy Center Way
Midvale, UT 84047

2.2  **Applicable Operations (326 IAC 6.8-10-4(3)(B))**

The roadways located within the boundaries of Savage are a mix of unpaved, gravel roads and paved asphalt roadways. A gravel parking lot is located on the property to the south of the office. A map showing the location of the paved roads, unpaved roads, and parking lot is included in Appendix A.

Savage is a transloading facility, where materials are loaded outdoors from a railcar into a truck. The majority of materials loaded onsite at Savage are in liquid form and are not associated with any fugitive dust emissions. Any solid materials are loaded using an enclosed conveyor. There are no storage piles located at the facility.
2.3 *Description of Applicable Operations (326 IAC 6.8-10-4(3)(D))*

The total length of unpaved gravel roads located onsite is 0.83 miles. The width of the gravel roads vary, from 20 feet to 50 feet for the widest road. The total length of paved asphalt roads is 0.6 miles, ranging in width from 20 feet to 40 feet. The parking areas cover approximately 34,000 square feet of the property.

The traffic at the facility mainly consists of trucks coming onsite to be loaded from rail cars. There is also a small amount of employee traffic, which is minimal compared to the large volume of trucks. Currently, the average daily traffic is 40 trucks. This average could double to 80 trucks per day with the proposed installation of two new gasoline loading carts in 2019. The average weight of a vehicle using the road is approximately 28.5 tons. A surface silt loading test has not been completed at Savage. To estimate the silt loading of the gravel roads and parking lot, a factor of 4.8% was used, taken from AP-42, Table 13.2.2-1 for gravel processing.

2.4 *Control Measures and Practices (326 IAC 6.8-10-4(3)(E) and (F))*

Currently, all unpaved roadways and parking areas onsite are covered with gravel to reduce fugitive emission. As needed, the unpaved roads and parking areas onsite are regveled. When conditions are dry, water is sprayed on both the paved and unpaved roads and parking areas to reduce fugitive dust.

Weather conditions, such as frigid weather or a large amount of snowfall, ice, or rain, may prevent Savage from applying the control measures described above. After such events, Savage will complete repairs or regraveling as necessary when the weather permits.
Appendix A
Site Map
326 IAC 8-4-7 Gasoline transports:
Authority: IC 13-14-8; IC 13-17-3-4; IC 13-17-3-11
Affected: IC 13-15; IC 13-17

Sec. 7. (a) No owner or operator of a gasoline transport shall cause, allow, or permit the transfer of gasoline between transports and storage tanks that are equipped with a vapor balance system or vapor recovery system unless:

1. the vapor balance system or vapor recovery system is connected and operating according to manufacturers' specifications;
2. gasoline transport compartment hatches are closed at all times during loading operations;
3. except as provided in section 9(i) of this rule (stack testing) and for sources subject to 40 CFR 60.503(b)* (Standards of Performance for New Stationary Sources) or 40 CFR 63.425(a)* (National Emission Standards for Hazardous Air Pollutants) requirements, there are no visible leaks, or otherwise detectable leaks (measured at twenty-one thousand (21,000) parts per million as propane as specified in 40 CFR 63.425(b)(1)*), in the gasoline transport's pressure/vacuum relief valves, hatch cover, trailer compartments, storage tanks, or associated vapor and liquid lines during loading or unloading; and
4. the pressure relief valves on gasoline transports are set to release at no less than four and eight-tenths (4.8) kilo Pascals (seven-tenths (0.7) pounds per square inch).

(b) Tank wagons are exempt from vapor balance requirements.

(c) When employees of the owner of a bulk gasoline terminal are present to supervise or perform loading, the owner of the terminal shall be responsible for compliance with subsection (a)(1) through (a)(3). The owner of the terminal shall also ensure that owners of gasoline transports loading at the terminal during unsupervised times comply with this section.

(d) Gasoline transports must be designed, maintained, and operated so as to be vapor-tight.

(e) Transfer of gasoline between a gasoline transport and a storage tank that is not equipped with a vapor balance system or vapor recovery system is not subject to this section. (Air Pollution Control Division; 326 IAC 8-4-7; filed Mar 10, 1988, 1:20 p.m.: 11 IR 2546; filed Aug 11, 1988, 1:40 p.m.: 13 IR 9; errata filed Sep 29, 1989, 4:30 p.m.: 13 IR 297; filed Oct 5, 1990, 3:46 p.m.: 23 IR 298; readopted filed Jan 10, 2001, 3:20 p.m.: 24 IR 1477; errata filed Nov 30, 2001, 12:15 p.m.: 25 IR 1185)
Savage Services
Attachment C of F089-41538-00607

326 IAC 8-4-9 (Leaks from transports and vapor collection systems; records) Rule
that will be included in such reports.

(m) An approveable reporting program shall include the following:
   (1) Submission of a report to the commissioner during June, September, and December that lists all leaking components that were located during the previous calendar months, but not repaired within fifteen (15) days, all leaking components awaiting unit turnaround, the total number of components inspected, and the total number of components found leaking.
   (2) Submission of a signed statement with the report attesting to the fact that, with the exception of those leaking components listed in the report, all monitoring and repairs were performed as stipulated in the monitoring program.
   (n) Each monitoring program shall specify the testing and calibration procedures to be used to determine compliance.
   (o) An approveable monitoring program shall use testing and calibration procedures consistent with Method 21 of 40 CFR 60, Appendix A.
   (p) Following submittal of the program description as required by subsection (a), the commissioner shall approve or disapprove such program within two (2) months following the submittal. If no action is taken within the two (2) month period, the program as submitted shall be deemed approved. If no program is submitted by a refinery by the time specified in subsection (a), the refinery shall be required to implement a program in accordance with the guidelines of subsections (b) through (o). If a program is disapproved, the disapproval shall indicate the specific portions of the program that are unacceptable. All acceptable portions of the program shall be implemented immediately. The owner or operator of the refinery shall have three (3) months after disapproval to amend the program or substantiate the program in a manner acceptable to the commissioner. At the end of such time, if the program is still unacceptable, the commissioner may require the refinery to comply with a program specified by the commissioner. Monitoring, record keeping, and reporting programs varying from the guidelines specified in subsections (b) through (o) shall be submitted to the U.S. EPA as a SIP revision.
   (q) Each refinery subject to this section shall comply with the following provisions:
   (1) The commissioner may require the operator to reschedule turnaround based on the number and severity of tagged leaks awaiting turnaround.
   (2) Except for safety pressure relief valves, no owner or operator of a petroleum refinery shall install or operate a valve at the end of a pipe or line containing volatile organic compounds unless the pipe or line is sealed with a second valve, a blind flange, a plug, or a cap. The sealing device may be removed only when a sample is being taken or during maintenance operations.
   (3) Pipeline valves and pressure relief valves in gaseous volatile organic compound service shall be marked in some manner that will be readily obvious to both refinery personnel performing monitoring and the staff.
   (r) The commissioner, upon written notice, may modify the monitoring, record keeping, and reporting requirements. (Air Pollution Control Division; 326 IAC 8-4-8; filed Mar 10, 1988, 1:20 p.m.: 11 IR 2540; filed Apr 18, 1990, 4:55 p.m.: 13 IR 1681; errata filed Sep 5, 1990, 2:20 p.m.: 14 IR 135; filed May 6, 1991, 4:45 p.m.: 14 IR 1719; readopted filed Jan 10, 2001, 3:20 p.m.: 24 IR 1477)

326 IAC 8-4-9 Leaks from transports and vapor collection systems; records

Authority: IC 13-14-8; IC 13-17-3-4; IC 13-17-3-11
Affected: IC 13-15; IC 13-17

Sec. 9. (a) This section is applicable to the following:
(1) All vapor balance systems and vapor control systems at sources subject to sections 4 through 6 of this rule.
(2) All gasoline transports subject to section 7 of this rule.
(b) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:
   (1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425(e)*, as follows:
      (A) Conduct the pressure and vacuum tests for the transport’s cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H2O (eighteen (18) inches H2O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H2O (six (6) inches H2O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H2O (one (1) inch H2O)
in five (5) minutes.

(B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:

(i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27* to repressurize the tank to four hundred sixty (460) millimeters H₂O (eighteen (18) inches H₂O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.

(ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5)

minute pressure increase is one hundred thirty (130) millimeters H₂O (five (5) inches H₂O).

(2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).

(c) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27* test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (b).

(d) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:

(1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

(A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H₂O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H₂O) in the gasoline transport;

(B) except for sources subject to 40 CFR 60.503(b)* (Standards of Performance for New Stationary Sources) or 40 CFR 63.425(a)* (National Emission Standards for Hazardous Air Pollutants) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21*, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(2) within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).

(e) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (b) or (c).

(f) The owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all certification testing. The records shall identify the following:

(1) The vapor balance, vapor collection, or vapor control system.

(2) The date of the test and, if applicable, retest.

(3) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

(g) The owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27* test either in the cab of the transport or affixed to the transport trailer.

The test record shall identify the following:

(1) The gasoline transport.

(2) The type and date of the test and, if applicable, date of retest.

(3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

(h) If the commissioner allows alternative test procedures in subsection (b)(1) or (d)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.
(i) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (d)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21* to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:

(1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R*).
(2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to New Source Performance Standards (40 CFR 60, Subpart XX*) and for all other bulk gas terminals.

*These documents are incorporated by reference. Copies may be obtained from the Government Printing Office, 732 North Capitol Street NW, Washington, D.C. 20401 or are available for review and copying at the Indiana Department of Environmental Management, Office of Air Quality, Indiana Government Center-North, Tenth Floor, 100 North Senate Avenue, Indianapolis, Indiana 46204. (Air Pollution Control Division; 326 IAC 8-4-9; filed Mar 10, 1988, 1:20 p.m.; 11 IR 2542; filed Nov 30, 1990, 4:20 p.m.; 14 IR 606; filed Jul 30, 1996, 2:00 p.m.; 19 IR 3351; filed Oct 5, 1999, 3:46 p.m.; 23 IR 299; readopted filed Jan 10, 2001, 3:20 p.m.: 24 IR 1477; errata filed Jan 14, 2002, 2:57 p.m.: 25 IR 1906; errata filed Dec 12, 2002, 3:35 p.m.: 26 IR 1568; filed Aug 26, 2004, 11:30 a.m.: 28 IR 49)

Rule 5. Miscellaneous Operations

326 IAC 8-5-1 Applicability of rule

Authority: IC 13-14-8; IC 13-17-3

Affected: IC 13-14-8-7; IC 13-17-1; IC 13-17-3

Sec. 1. This rule applies to the following:
(1) Facilities or sources existing as of January 1, 1980, of the types described in section 2 of this rule and facilities or sources existing as of November 1, 1980, of the types described in sections 3 through 5 of this rule located in the following counties:
   (A) Clark.
   (B) Elkhart.
   (C) Floyd.
   (D) Lake.
   (E) Marion.
   (F) Porter.
   (G) St. Joseph.
(2) Sources or facilities, construction of which commences after January 1, 1980, of the types described in section 2 of this rule and sources or facilities, construction of which commences after November 1, 1980, of the types described in sections 3 through 5 of this rule located anywhere in the state.
(3) Any asphalt paving application made after January 1, 1980.
(4) Facilities or sources, construction of which commences after April 1, 2007, of the types described in section 6 of this rule located anywhere in the state.

(Air Pollution Control Division; 326 IAC 8-5-1; filed Mar 10, 1988, 1:20 p.m.; 11 IR 2543; readopted filed Jan 10, 2001, 3:20 p.m.: 24 IR 1477; filed Feb 20, 2007, 3:14 p.m.: 20070321-IR-326050197FRA)

326 IAC 8-5-2 Asphalt paving rules

Authority: IC 13-14-8; IC 13-17-3

Affected: IC 13-17

Sec. 2. (a) This section applies to any paving application anywhere in the state. For the purposes of this section, the term "asphalt emulsion" shall mean any dispersion of asphalt in water, optional additives, optional distillates, and emulsifying agents.
(b) No person shall cause or allow the use of cutback asphalt or asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion as determined by ASTM D244 80a "Emulsific Asphalts" ASTM part 15, 1981 ASTM 1916
Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

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<th>Savage Services</th>
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<tr>
<td>Source Location:</td>
<td>3600 Gibson Transfer Road, Hammond, IN 46323</td>
</tr>
<tr>
<td>County:</td>
<td>Lake (North Township)</td>
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<tr>
<td>SIC Code:</td>
<td>4789 (Transportation Services, Not Elsewhere Classified)</td>
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<td>Operation Permit No.:</td>
<td>F089-41538-00607</td>
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<tr>
<td>Permit Reviewer:</td>
<td>Mehul Sura</td>
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</table>

On June 4, 2019, the Office of Air Quality (OAQ) received an application from Savage Services related to the operation of an existing natural gas liquid condensate, gasoline and fuel additive railcar transfer services.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Lake County.

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<tr>
<th>Pollutant</th>
<th>Designation</th>
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<td>SO₂</td>
<td>Better than national standards.</td>
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<tr>
<td>CO</td>
<td>Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.</td>
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<tr>
<td>O₃</td>
<td>On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard.¹²</td>
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<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective February 6, 2012, for the annual PM₂.₅ standard.</td>
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<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM₂.₅ standard.</td>
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<td>PM₁₀</td>
<td>Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.</td>
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<tr>
<td>NO₂</td>
<td>Cannot be classified or better than national standards.</td>
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<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011.</td>
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¹¹The U.S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3 for the 1-hour standard.
²²The department has filed a legal challenge to U.S. EPA’s designation in 77 FR 34228.

(a) Ozone Standards
U.S. EPA, in the Federal Register Notice 77 FR 34228 dated June 11, 2012, designated Lake County as nonattainment for the 2008 8-hour ozone standard. On August 1, 2012, the air pollution control board issued an emergency rule adopting the U.S. EPA’s designation. This rule became effective August 9, 2012. IDEM does not agree with U.S. EPA’s designation of nonattainment. IDEM filed a suit against U.S. EPA in the U.S. Court of Appeals for the DC Circuit
on July 19, 2012. However, in order to assure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA’s designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(b) PM$_{2.5}$
Lake County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Lake County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Savage Services on March 8, 2018, relating to natural gas liquid condensate, gasoline and fuel additive railcar transfer services.

The source consists of the following unpermitted emission units:

(a) One (1) liquid truck loading operation, identified as EU1, constructed in 2006, consisting of:

(i) Natural gas liquid condensate transfer services, identified as EU1N, with a maximum throughput capacity of 8 rail cars per day, using submerged fill method and vapor recovery system for VOC control, and exhausting through vent.

(ii) Gasoline transfer services, identified as EU1G, with a maximum throughput capacity of 16 rail cars per day, using submerged fill method and vapor recovery system for VOC control, and exhausting through vent.

(b) One (1) liquid truck loading operation, identified as EU4, constructed in 2006, consisting of fuel additives transfer services, with a maximum throughput capacity of 8 rail cars per day, voluntarily controlled by carbon adsorber CE-1 and exhausting through vent. The following fuel additives material transfer services are performed at EU4:

Acetic Acid, Butane, Fuel Additives, Isooctane, Lube Oil, Coke Tar, Propylene Glycol, Wax and Base Oil and Wannate (MDI)

(c) One (1) natural gas-fired boiler, identified as EU2, constructed in 2006, with a maximum heat input capacity of 8.4 MMBtu/hr, without control and exhausting inside.

(d) One (1) solid loading operation, identified as EU3, constructed in 2006, with a maximum throughput capacity of 100 tons per hour, used for quicklime, sodium bicarbonate and other
similar materials transfer from railcar to truck, controlled by baghouse CE-2. Reference source not found. and exhausting to atmosphere.

(e) Unpaved roads

<table>
<thead>
<tr>
<th>Enforcement Issues</th>
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<tbody>
<tr>
<td>IDEM is aware that all equipment (except EU1G) has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.</td>
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<tr>
<th>Emission Calculations</th>
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<tr>
<td>See Appendix A of this TSD for detailed emission calculations.</td>
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<table>
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<th>Permit Level Determination – FESOP</th>
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<tbody>
<tr>
<td>The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.</td>
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<table>
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<tr>
<th>Unrestricted Source-Wide Emissions (ton/year)</th>
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<tbody>
<tr>
<td>PM</td>
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<tr>
<td>Total PTE of Entire Source Excluding Fugitives*, **</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
</tr>
</tbody>
</table>

(1) Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant."

(2) PM2.5 listed is direct PM2.5.

(3) Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

**Only EU1N or EU1G is capable of product loadout at a time. Therefore, for the total PTE of the Entire Source Excluding Fugitives, the worst case emissions between the two operating scenarios is used.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of VOC is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3)
and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**PTE of the Entire Source After Issuance of the FESOP**

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

<table>
<thead>
<tr>
<th>Process/ Emission Unit</th>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM</th>
<th>PM10(^{(1)})</th>
<th>PM2.5(^{(2)})</th>
<th>SO(_2)</th>
<th>NO(_x)</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP (n-Hexane)(^{(3)})</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives(*, **)</td>
<td>24.67</td>
<td>24.88</td>
<td>24.88</td>
<td>0.02</td>
<td>3.61</td>
<td>45.12</td>
<td>3.03</td>
<td>16.80</td>
<td>4.68</td>
<td></td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>-</td>
<td>-</td>
<td>250</td>
<td>NA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>100</td>
<td>100</td>
<td>-</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
</tbody>
</table>

\(^{(1)}\)Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

\(^{(2)}\)PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

\(^{(3)}\)Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

**Only EU1N or EU1G is capable of product loadout at a time. Therefore, for the total PTE of the Entire Source Excluding Fugitives, the worst case emissions between the two operating scenarios is used.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take VOC limits in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-3 (Emission Offset) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) and 326 IAC 2-8 (FESOP) for more information regarding the limits.

(a) This new stationary source is minor under Title V (326 IAC 2-7) because the potential to emit criteria pollutants and HAPs from the entire source is less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This new stationary source is minor under PSD (326 IAC 2-2) because the potential to emit of all PSD regulated pollutants from the entire source is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) This new stationary source is minor under Emission Offset (326 IAC 2-3) because the potential to emit of VOC and NO\(_x\), which are precursors of ozone nonattainment regulated pollutant, from
the entire source are less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

**Federal Rule Applicability Determination**

**New Source Performance Standards (NSPS):**

(a) Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

The natural gas-fired boiler (EU2) is not subject to the NSPS, 40 CFR 60, Subpart Dc because this boiler has a maximum design heat input capacity less than 10 MMBtu/hr.

(b) Subpart XX—Standards of Performance for Bulk Gasoline Terminals

The gasoline transfer services at EU1 at this source is not subject to the requirements of NSPS, 40 CFR 60, Subpart XX because the source does not receives gasoline by pipeline, ship or barge.

(c) There are no NSPS (326 IAC 12 and 40 CFR Part 60) included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) Subpart R—National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

The source is not subject to the requirements of this NESHAP, Subpart R because this source is not a major source of HAPs.

(b) Subpart EEEE—National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)

The source is not subject to the requirements of this NESHAP, Subpart EEEE because this source is not a major source of HAPs.

(c) Subpart BBBBBB —National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

The source is not subject to the requirements of this NESHAP, Subpart BBBBBB because this source does not receives gasoline by pipeline, ship or barge, or cargo tank.

(d) Subpart JJJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

The natural gas-fired boiler (EU2) is considered gas-fired boiler under this NESHAP, therefore, this boiler is not subject to the requirements of this NESHAP, JJJJJJ.

(e) There are no NESHAPs (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

**Compliance Assurance Monitoring (CAM)**

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.
State Rule Applicability Determination

(a) 326 IAC 1-5-2 (Emergency Reduction Plans)
The source is not subject to 326 IAC 1-5-2, because the potential to emit of any pollutant is less than one hundred (100) tons per year.

(b) 326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

(c) 326 IAC 2-8-4 (FESOP), 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
FESOP, PSD, and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

FESOP and Emission Offset (EO) Minor Source Limits
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-3 (Emission Offset), not applicable, the Permittee shall comply with the following:

(a) The VOC emissions from EU1N (after control) shall not exceed 8.98 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The VOC emissions from EU1G (after control) shall not exceed 26.24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The VOC emissions from EU4 (before control) shall not exceed 18.69 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-3 (Emission Offset) not applicable.

(d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
None of the emission units at this source is subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from each emission unit at this source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(e) 326 IAC 2-6 (Emission Reporting)
Since this source is located in Lake County, and has actual emissions of VOC greater than or equal to twenty-five (25) tons per year, an emission statement covering the previous calendar year must be submitted by July 1 of each year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

(1) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
(g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the unpaved roads at this source have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

(h) 326 IAC 6.8 (PM Limitations for Lake County)
326 IAC 6.8 applies to sources or facilities located in Lake County that emit particulate matter. Sources specifically listed in the rule shall comply with the limitations in 326 IAC 6-8-4, 326 IAC 6.8-5, and 326 IAC 6.8-8 through 326 IAC 6.8-11, as applicable. Sources not specifically listed in 326 IAC 6.8-4, 326 IAC 6.8-5, and 326 IAC 6.8-8 through 326 IAC 6.8-11 shall comply with 326 IAC 6.8-2, if they have the potential to emit ten (10) tons or more of particulate matter (PM) and are not taking a limit of less than ten (10) tons of particulate matter (PM).

This source, located in Lake County, and has the potential to emit ten (10) tons or more of particulate matter (PM) and is not taking a limit of less than ten (10) tons of particulate matter (PM). Therefore, 326 IAC 6.8 applies and the requirements are included in the permit.

(i) Pursuant to 326 IAC 6.8-1-2(a), particulate matter (PM) emissions from the solid loading operation (EU3) shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

The baghouse CE-2 shall be in operation and control emissions from EU3 at all times that EU3 is in operation.

(ii) Pursuant to 326 IAC 6.8-1-2(b)(3), particulate matter (PM) emissions from the natural gas-fired boiler (EU2) shall not exceed 0.01 grains per dry standard cubic foot (dscf).

Unpaved roads activity is subject to the requirements of 326 IAC 6.8-10, because the Unpaved roads have potential fugitive particulate emissions more than 5 tons per year. The Permittee shall comply with the particulate emission limitations specified in 326 IAC 6.8-10-3 (Lake County Fugitive Particulate Matter Control Requirements) for the unpaved roads, using the fugitive dust control plan (FDCP) (included as Attachment A the permit).

(i) 326 IAC 8-4-4 (Bulk gasoline terminals)
The gasoline transfer services at EU1G is subject to the requirements of this rule because it is considered bulk gasoline terminal and the source is located in Lake County.

(i) Pursuant to 326 IAC 8-4-4(a), the Permittee shall not allow loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

(1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:

(A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 mg/l of VOC to the atmosphere.

(B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.

(C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.

(2) Displaced vapors and gases are vented only to the vapor control system.
(3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

The source has chosen option (i)(1)(C) above as vapor control method. The control efficiency of the option (i)(1)(C) shall be equivalent or greater than the control efficiency under option (i)(1)(A). Therefore, 80 mg/l of VOC limit specified under option (i)(1)(A) will apply to the gasoline transfer services at EU1.

(ii) Pursuant to 326 IAC 8-4-4(b), if employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

(j) 326 IAC 8-4-7 (Gasoline transports)
The vapor recovery system equipped on EU1G is subject to 326 IAC 8-4-7 because gasoline transport occurs at EU1G and this source is located in Lake County. The source shall comply with the requirements of 326 IAC 8-4-7 for EU1G.

(k) 326 IAC 8-4-9 (Leaks from transports and vapor collection systems; records)
The vapor recovery system equipped on EU1G is subject to 326 IAC 8-4-9 (Leaks from transports and vapor collection systems; records) because this vapor recovery system is subject to 326 IAC 8-4-4 (Bulk gasoline terminals) and this source is located in Lake County. The source shall comply with the requirements of 326 IAC 8-4-9 for vapor recovery system equipped on EU1G.

(l) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
The source is not subject to requirements of this rule because this stationary source was constructed after December 31, 1994.

(m) 326 IAC 8-1-6 (New facilities; general reduction requirements)
This rule applies to new facilities as of January 1, 1980, that have potential emissions of twenty-five (25) tons per year or more of VOC, are located anywhere in the state, and are not otherwise regulated under Article 8, 326 IAC 20-48 or 326 IAC 20-56.

(i) The natural gas-fired boiler (EU2) has potential emissions less than 25 tons per year. Therefore, this rule does not apply to this boiler. There are no other 326 IAC 8 rules that are applicable to this type of process.

(ii) The gasoline transfer services at EU1G is subject to the 326 IAC 8-4-4 (Bulk gasoline terminals). Therefore, it is not subject to the requirements of 326 IAC 8-1-6.

(iii) The natural gas liquid condensate transfer services at EU1N has potential emissions more than 25 tons per year and it is not subject to any other rule in Article 8. Therefore, this rule apply to EU1N.

Pursuant to 326 IAC 8-1-6, VOCs BACT for EU1N is as follows:

(i) The VOC emissions from EU1N shall be controlled by submerged fill and vapor recovery control.
(ii) The minimum overall VOC reduction efficiency (including collection and control efficiency) for the submerged fill and vapor recovery system shall be 95%.

(iii) The VOC emissions from EU1N shall not exceed 8.98 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(iv) The unlimited VOC potential emissions from EU4 is greater than 25 tons per year. The source opted to take VOC limit in order to render the 326 IAC 8-1-6 VOC BACT requirements not applicable to EU4. This limit is as follows:

The VOC emissions from EU4 (before control) shall not exceed 18.69 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit in conjunction with fugitive VOC emission from EU4 shall limit the total VOC emissions from EU4 to less than 25 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 not applicable to EU4.

(n) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(o) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

(a) The compliance determination requirements applicable to this source are as follows:

In order to determine compliance with the VOC limits for the EU1N, EU1G and EU4, the VOC emissions from EU1N, EU1G and EU4 shall be calculated on monthly basis. The equations to calculate the VOC emissions are specified in the permit.

(b) The testing requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>Pollutant</th>
<th>Timeframe for Testing</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU1N</td>
<td>submerged fill and vapor recovery system</td>
<td>overall VOC reduction efficiency (including collection and control efficiency)</td>
<td>no later than 180 days after the issuance of this FESOP</td>
<td>every 5 years</td>
<td>326 IAC 2-3, 326 IAC 2-8-4, and 326 IAC 8-1-6</td>
</tr>
<tr>
<td>EU1G</td>
<td>submerged fill and vapor recovery system</td>
<td>VOC</td>
<td>no later than 180 days after the issuance of this FESOP or initial start-up of EU1G, which ever is later</td>
<td>every 5 years</td>
<td>326 IAC 2-3, 326 IAC 2-8-4, and 326 IAC 8-4-4</td>
</tr>
</tbody>
</table>

(c) The compliance monitoring requirement applicable to this source is as follows:

<table>
<thead>
<tr>
<th>Emission Unit/Control</th>
<th>Operating Parameters</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>solid loading operation (EU3)</td>
<td>baghouse CE-2</td>
<td>Pressure Drop</td>
</tr>
</tbody>
</table>
This monitoring conditions is necessary because the baghouse CE-2 for EU3 must operate properly to assure compliance with 326 IAC 6.8 (PM Limitations for Lake County).

**Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 4, 2019.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F089-41538-00607. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

**IDEM Contact**

(a) If you have any questions regarding this permit, please contact Mehul Sura, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-6868 or (800) 451-6027, and ask for Mehul Sura or (317) 233-6868.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/)

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).
### Uncontrolled Emissions (tons/year)

<table>
<thead>
<tr>
<th>stack/vent emissions</th>
<th>Process</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>n-Hexane</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>EU1N</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>280.76</td>
<td>-</td>
<td>8.95</td>
<td>2.50</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EU1G</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>524.71</td>
<td>-</td>
<td>16.73</td>
<td>4.68</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EU4</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>137.54</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EU2</td>
<td>0.07</td>
<td>0.27</td>
<td>0.27</td>
<td>0.02</td>
<td>3.61</td>
<td>0.20</td>
<td>3.03</td>
<td>0.07</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EU3</td>
<td>24.60</td>
<td>24.60</td>
<td>24.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives ***</td>
<td>24.67</td>
<td>24.88</td>
<td>24.88</td>
<td>0.02</td>
<td>3.61</td>
<td>662.45</td>
<td>3.03</td>
<td>16.80</td>
<td>4.68</td>
<td></td>
</tr>
</tbody>
</table>

### Fugitive Emissions

| Fugitive Emissions | EU1N fugitive | - | - | - | - | 1.74 | - | 0.06 | 0.02 |
|                    | EU1G fugitive | - | - | - | - | 3.58 | - | 0.11 | 0.03 |
|                    | EU4 fugitive | - | - | - | - | 6.21 | - | -    | -     |
|                    | Unpaved Roads fugitive | 16.38 | 4.17 | 0.42 |

### Limited/controlled Emissions (tons/year)

<table>
<thead>
<tr>
<th>stack/vent emissions</th>
<th>Process</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>n-Hexane</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>EU1N</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>8.98 *</td>
<td>-</td>
<td>8.95</td>
<td>2.50</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EU1G</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>26.24 *</td>
<td>16.73</td>
<td>4.68</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>EU4</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>18.69 **</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EU2</td>
<td>0.07</td>
<td>0.27</td>
<td>0.27</td>
<td>0.02</td>
<td>3.61</td>
<td>0.20</td>
<td>3.03</td>
<td>0.07</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EU3</td>
<td>24.602</td>
<td>24.602</td>
<td>24.602</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives ***</td>
<td>24.67</td>
<td>24.88</td>
<td>24.88</td>
<td>0.02</td>
<td>3.61</td>
<td>45.12</td>
<td>3.03</td>
<td>16.80</td>
<td>4.68</td>
<td></td>
</tr>
</tbody>
</table>

### Fugitive Emissions

| Fugitive Emissions | EU1N fugitive | - | - | - | - | 1.74 | - | 0.06 | 0.02 |
|                    | EU1G fugitive | - | - | - | - | 3.58 | - | 0.11 | 0.03 |
|                    | EU4 fugitive | - | - | - | - | 6.21 | - | -    | -     |
|                    | Unpaved Roads fugitive | 16.38 | 4.17 | 0.42 |

* PTEs are based on the limits taken by the source.  
** PTE is based on 326 IAC 8-1-6 BACT avoidance limit.  
*** Only EU1N or EU1G is capable of product loadout at a time. Therefore, for the total PTE of the Entire Source Excluding Fugitives, the worst case emissions between the two operating scenarios is used.
EU1 and EU4 VOC emissions

### Throughput

<table>
<thead>
<tr>
<th>Material</th>
<th>EU1</th>
<th>EU2</th>
<th>EU4</th>
<th>EU4</th>
<th>EU4</th>
<th>EU4</th>
<th>EU4</th>
<th>EU4</th>
<th>EU4</th>
<th>EU4</th>
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<th>EU4</th>
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</thead>
<tbody>
<tr>
<td>Natural Gas Liquid</td>
<td>8</td>
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<tr>
<td>Condensate</td>
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<td>5840</td>
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<td>Unleaded Gasoline Acetic Acid</td>
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<tr>
<td>Additives Isooctane</td>
<td>6.1</td>
<td>3.9</td>
<td>0.36</td>
<td>0.0039</td>
<td>1.7</td>
<td>0.000193</td>
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<td>0.0029</td>
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<td>0.0029</td>
<td>0.00188</td>
<td>0.019</td>
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<tr>
<td>Wannate PM-200s (MDI) Coke Tar</td>
<td>65</td>
<td>95</td>
<td>60.05</td>
<td>66</td>
<td>114.26</td>
<td>120</td>
<td>120</td>
<td>250.25</td>
<td>120</td>
<td>76.09</td>
<td>120</td>
<td>65</td>
<td>95</td>
<td>60.05</td>
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<td>Glycol Wax Butane (Vapor)</td>
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### Hose Connection Evaporative Emissions

<table>
<thead>
<tr>
<th>Load Type</th>
<th>EU1</th>
<th>EU2</th>
<th>EU4</th>
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</tr>
<tr>
<td>Condensate</td>
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</tr>
<tr>
<td>Unleaded Gasoline Acetic Acid</td>
<td></td>
<td></td>
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<tr>
<td>Additives Isooctane</td>
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<tr>
<td>Wannate PM-200s (MDI) Coke Tar</td>
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<tr>
<td>Glycol Wax Butane (Vapor)</td>
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<td></td>
<td></td>
<td></td>
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<td></td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Methodology

**Truck Loading PTE are calculated as follows:**

\[
\text{Uncontrolled Emissions (tons/year)} = \text{Loading Loss (lb/1000 gal)} \times \text{Maximum cars/yr} \times \left(\frac{\text{Max. car volume (gal)} \times 1\text{,}000}{1,000,000,000}\right) \times \frac{1}{2000} \left(\frac{ton}{lb}\right)
\]

**Controlled Potential Emissions (tons/year) = Uncontrolled Emissions (tons/year) \times \left[1 - \left(\frac{\text{Control Efficiency (95%)} \times 100}{100}\right)\right] \times 1/2000 \left(\frac{ton}{lb}\right)**

**Hose Connection Evaporative Emissions are calculated as follows:**

\[
\text{Uncontrolled Emission (tons/year)} = \text{Length} \times \pi \times \text{Diameter} \times \frac{1}{12} \times \text{Thickness} \times \frac{1}{12} \times 7.48 \times \text{Density} \times \# \text{cars/year} \times \frac{1}{2000} \left(\frac{ton}{lb}\right)
\]

*Note: Assume 100% of fugitives are VOCs.*

### Acetic Acid Vapor Pressure Calculation

\[
\text{Antoine's Equation: } \log P = A - \frac{B}{T + C}
\]

Where:

- \(P\) = true vapor pressure, mm Hg
- \(A\) = dimensionless constant
- \(B\) = constant, °C
- \(C\) = constant, °C
- \(T\) = Temperature, °C

**Table 7.1-5 from AP-42 Chapter 7.1 provides the constants for acetic acid.**

<table>
<thead>
<tr>
<th>Month</th>
<th>Average Temperature</th>
<th>Average Vapor Pressure</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>3.579798155</td>
<td>3.471941919</td>
</tr>
<tr>
<td>February</td>
<td>3.4886711</td>
<td>3.7572972</td>
</tr>
<tr>
<td>March</td>
<td>3.7250688</td>
<td>3.471941919</td>
</tr>
<tr>
<td>April</td>
<td>3.7250688</td>
<td>3.471941919</td>
</tr>
<tr>
<td>May</td>
<td>3.4886711</td>
<td>3.7572972</td>
</tr>
<tr>
<td>June</td>
<td>3.7250688</td>
<td>3.471941919</td>
</tr>
<tr>
<td>July</td>
<td>3.7250688</td>
<td>3.471941919</td>
</tr>
<tr>
<td>August</td>
<td>3.7250688</td>
<td>3.471941919</td>
</tr>
<tr>
<td>September</td>
<td>3.7250688</td>
<td>3.471941919</td>
</tr>
<tr>
<td>October</td>
<td>3.7250688</td>
<td>3.471941919</td>
</tr>
<tr>
<td>November</td>
<td>3.7250688</td>
<td>3.471941919</td>
</tr>
<tr>
<td>December</td>
<td>3.7250688</td>
<td>3.471941919</td>
</tr>
</tbody>
</table>

### Acetic Acid Vapor Pressure Calculation

\[
\text{Loading Loss calculation based on AP-42, Chapter 5.2: Transportation And Marketing Of Petroleum Liquids}
\]

\[
\text{LL} = 12.46 \times \frac{S}{T}
\]

Where:

- \(LL\) = loading loss (lb/1000 gal)
- \(S\) = saturation factor (from AP-42 Table 5.2-1)
- \(T\) = true vapor pressure (psia)
- \(M\) = molecular weight of vapor

**Butane emission are assumed to be zero because it is in gaseous form when loaded and is loaded under pressure.**
## EU1 HAPs emissions

<table>
<thead>
<tr>
<th>Compound</th>
<th>EU1 - Natural Gas Liquid Condensate</th>
<th>EU1 - gasoline transfer services</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Truck Loading PTE</td>
<td>Hose Fugitives PTE</td>
</tr>
<tr>
<td></td>
<td>tons/yr</td>
<td>tons/yr</td>
</tr>
<tr>
<td>Naphthalene</td>
<td>0.000124</td>
<td>0.0348</td>
</tr>
<tr>
<td>Toluene</td>
<td>0.00722</td>
<td>2.0259</td>
</tr>
<tr>
<td>Xylene</td>
<td>0.00434</td>
<td>1.2180</td>
</tr>
<tr>
<td>1,2,4-Trimethylbenzene</td>
<td>0.00128</td>
<td>0.3599</td>
</tr>
<tr>
<td>Benzene</td>
<td>0.000957</td>
<td>0.2686</td>
</tr>
<tr>
<td>Cumene</td>
<td>0.000167</td>
<td>0.0470</td>
</tr>
<tr>
<td>Cyclohexane</td>
<td>0.00330</td>
<td>0.9279</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>0.000920</td>
<td>0.2582</td>
</tr>
<tr>
<td>n-Hexane</td>
<td>0.00892</td>
<td>2.5036</td>
</tr>
<tr>
<td>2,2,4-Trimethylpentane</td>
<td>0.00466</td>
<td>1.3077</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>0.032</td>
<td>8.951</td>
</tr>
</tbody>
</table>

Vapor Speciation taken from Gasoline test results

There are no HAPs emissions from the loading operation at EU4.

Truck Loading PTE (tons/yr) = Vapor Fraction x Truck Loading Uncontrolled Emissions (tons/year)

Hose Fugitives PTE (tons/yr) = Vapor Fraction x Hose Connection Evaporative Uncontrolled Emission (tons/year)
EU3 - solid loading operation

Solids Loading (EU-3) Emissions - 1 portable conveyor for solids loading from hopper car to tanker truck at the facility

Calculations based on AP-42 Chapter 13.2.4 Aggregate Handling and Storage Piles

Equation 1:
\[ E = k(0.0032)((U/5)^{1.3})/(M/2)^{1.4} \]

where
- \( E \) = Emission Factor (lb/ton)
- \( k \) = particle size multiplier (dimensionless)
- \( U \) = mean wind speed (miles per hour)
- \( M \) = material moisture content (%)

For aggregates handled in Hammond, IN:

<table>
<thead>
<tr>
<th>Material</th>
<th>Quicklime, sodium bicarbonate</th>
</tr>
</thead>
<tbody>
<tr>
<td>( k )</td>
<td>0.74</td>
</tr>
<tr>
<td>( U )</td>
<td>7 mph</td>
</tr>
<tr>
<td>( M )</td>
<td>0.25%</td>
</tr>
<tr>
<td>( E )</td>
<td>0.06740 lb PM/ton</td>
</tr>
</tbody>
</table>

Moisture content will vary based on type of material loaded, so lowest content is used to estimate highest emissions

<table>
<thead>
<tr>
<th>Maximum Throughput of conveyor:</th>
<th>100 tons/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>730,000 tons/yr</td>
</tr>
</tbody>
</table>

Uncontrolled Annual PTE for PM for EU-3

| 1 conveyor (EU-3): | 6.7 lbs/hr | 49,204 lbs/yr | 24.6 tons/yr |

A baghouse can be utilized to control emissions from solids loading.

Control Efficiency | 99% Based on manufacturer's specifications

Controlled Annual PTE for PM for EU-3

| Controlled Emissions | 0.067 lbs/hr | 492 lbs/yr | 0.25 tons/yr |
**EU2 - natural gas-fired boiler**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.07</td>
<td>0.27</td>
<td>0.27</td>
<td>0.02</td>
<td>3.61</td>
<td>0.20</td>
<td>3.03</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants (HAPs)**

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>0.07</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>7.6E-05</td>
<td>4.3E-05</td>
<td>2.7E-03</td>
<td>0.06</td>
<td>1.2E-04</td>
<td>0.07</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>2.0E-04</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.8E-05</td>
<td>4.0E-05</td>
<td>5.0E-05</td>
<td>1.4E-05</td>
<td>7.6E-05</td>
<td>0.07</td>
</tr>
</tbody>
</table>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Condensate/Gasoline Trucks (round trip)</td>
<td>25.5</td>
<td>30.7</td>
<td>11198.2</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>14.5</td>
<td>7.7</td>
<td>2621.5</td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = 28.5 tons/trip

Unmitigated Emission Factor, \( Ef = k^{[(s/12)^a]^{[[(W/3)^b]}} \) (Equation 1a from AP-42 13.2.2)

where 
- \( k = 4.9 \) PM, 1.5 PM10, 0.15 PM2.5  
- \( s = 4.8 \)  
- \( a = 0.7 \)  
- \( W = 28.5 \) tons  
- \( b = 0.45 \)

Mitigated Emission Factor, \( E_{ext} = E \times [(365 - P)/365] \) (Equation 2 from AP-42 13.2.2)

where \( P = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

Mitigated Emission Factor, \( E_{ext} = E \times [(365 - P)/365] \) (Equation 2 from AP-42 13.2.2)

where \( P = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

Mitigated Emission Factor, \( E_{ext} = E \times [(365 - P)/365] \) (Equation 2 from AP-42 13.2.2)

where \( P = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

Dust Control Efficiency = 50% 50% 50% (pursuant to control measures outlined in fugitive dust control plan)

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (After Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>26.16</td>
<td>6.67</td>
<td>0.67</td>
<td>13.08</td>
<td>3.33</td>
<td>0.33</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>6.59</td>
<td>1.68</td>
<td>0.17</td>
<td>3.30</td>
<td>0.84</td>
<td>0.08</td>
</tr>
<tr>
<td>Totals</td>
<td>32.75</td>
<td>8.35</td>
<td>0.83</td>
<td>16.38</td>
<td>4.17</td>
<td>0.42</td>
</tr>
</tbody>
</table>

Methodology

<table>
<thead>
<tr>
<th>Formula</th>
<th>Description</th>
<th>Abbreviations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Weight driven per day (ton/day)</td>
<td>[Maximum Weight of Loaded Vehicle (tons/trip) \times [Maximum trips per day (trip/day)]</td>
<td>PM = Particulate Matter</td>
</tr>
<tr>
<td>Maximum one-way distance (mi/trip)</td>
<td>[Maximum one-way distance (feet/trip) \div [5280 ft/mile] ]</td>
<td>PM10 = Particulate Matter (&lt;10 um)</td>
</tr>
<tr>
<td>Maximum one-way miles (miles/day)</td>
<td>[Maximum trips per year (trip/day) \times [5280 ft/mile] ]</td>
<td>PM2.5 = Particulate Matter (&lt;2.5 um)</td>
</tr>
<tr>
<td>Average Vehicle Weight Per Trip (ton/trip)</td>
<td>SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]</td>
<td>PTE = Potential to Emit</td>
</tr>
<tr>
<td>Average Miles Per Trip (miles/trip)</td>
<td>SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]</td>
<td></td>
</tr>
<tr>
<td>Mitigated PTE (Before Control) (tons/yr)</td>
<td>(Maximum one-way miles (miles/yr)) \times [Mitigated Emission Factor (lb/mile) ] \times (ton/2000 lbs)</td>
<td></td>
</tr>
<tr>
<td>Mitigated PTE (After Control) (tons/yr)</td>
<td>(Mitigated PTE (Before Control) (tons/yr)) \times (1 - Dust Control Efficiency)</td>
<td></td>
</tr>
</tbody>
</table>
Indiana Department of Environmental Management  
Office of Air Quality  
Appendix B – BACT Analyses  
Technical Support Document (TSD)

### Source Background and Description

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Savage Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>3600 Gibson Transfer Road, Hammond, IN 46323</td>
</tr>
<tr>
<td>County:</td>
<td>Lake (North Township)</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>4789</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>F089-41538-00607</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Mehul Sura</td>
</tr>
</tbody>
</table>

### Proposed Expansion

On June 4, 2019, the Office of Air Quality (OAQ) received an application from Savage Services related to the operation of the following emission unit:

(a) One (1) natural gas liquid condensate loading operation, identified as EU1, constructed in 2006, consisting of:

   (i) Natural gas liquid condensate transfer from rail cars to trucks, identified as EU1N, with a maximum transfer rate of 8 rail cars per day, using submerged fill method and vapor recovery system for VOC control, and exhausting through vent.

### Requirement for Best Available Control Technology (BACT)

The provision of 326 IAC 8-1-6 (New facilities; general reduction requirements) requires a VOC BACT review to be performed on any facility which meets the following criteria:

(a) constructed on or after January 1, 1980;

(b) has potential emissions of twenty-five (25) tons or more per year of VOC;

(c) located anywhere in the state; and

(d) not otherwise regulated by:

   (A) other provisions of article 8;

   (B) 326 IAC 20-48; or

   (C) 326 IAC 20-56.

EU1N is subject to the requirements of 326 IAC 8-1-6 because this operation has potential VOC emissions more than twenty-five (25) tons per year, has a construction date after January 1, 1980 and this operation is not otherwise regulated by other provisions of article 8. Therefore, EU1N is subject to a 326 IAC 8-1-6 VOC BACT analysis.
Summary of the Best Available Control Technology (BACT) Process

BACT is a mass emission limitation based on the maximum degree of pollution reduction of emissions, which is achievable on a case-by-case basis. BACT analysis takes into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, work practices, and operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause or contribute to air pollution, thereby protecting public health and the environment.

Federal guidance on BACT requires an evaluation that follows a “top down” process. In this approach, the applicant identifies the best-controlled similar source on the basis of controls required by regulation or permit, or controls achieved in practice. The highest level of control is then evaluated for technical feasibility.

The five (5) basic steps of a top-down BACT analysis are listed below:

Step 1: Identify Potential Control Technologies

The first step is to identify potentially “available” control options for each emission unit and for each pollutant under review. Available options should consist of a comprehensive list of those technologies with a potentially practical application to the emissions unit in question. The list should include lowest achievable emission rate (LAER) technologies, innovative technologies, and controls applied to similar source categories. There is no requirement in the State or Federal regulations to require innovative control to be used as BACT.

Step 2: Eliminate Technically Infeasible Options

The second step is to eliminate technically infeasible options from further consideration. To be considered feasible, a technology must be both available and applicable. It is important in this step that any presentation of a technical argument for eliminating a technology from further consideration be clearly documented based on physical, chemical, engineering, and source-specific factors related to safe and successful use of the controls. Innovative control means a control that has not been demonstrated in a commercial application on similar units. Innovative controls are normally given a waiver from the BACT requirements due to the uncertainty of actual control efficiency. Based on this, the OAQ will not evaluate or require any innovative controls for this BACT analysis. Only available and proven control technologies are evaluated. A control technology is considered available when there are sufficient data indicating that the technology results in a reduction in emissions of regulated pollutants.

Step 3: Rank the Remaining Control Technologies by Control Effectiveness

The third step is to rank the technologies not eliminated in Step 2 in order of descending control effectiveness for each pollutant of concern. The ranked alternatives are reviewed in terms of environmental, energy, and economic impacts specific to the proposed modification. If the analysis determines that the evaluated alternative is not appropriate as BACT due to any of the impacts, then the next most effective is evaluated. This process is repeated until a control alternative is chosen as BACT. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical or economic evaluation, except for the environmental analyses.

Step 4: Evaluate the Most Effective Controls and Document the Results

The fourth step entails an evaluation of energy, environmental, and economic impacts for determining a final level of control. The evaluation begins with the most stringent control option and continues until a technology under consideration cannot be eliminated based on adverse
energy, environmental, or economic impacts.

Step 5: Select BACT

The fifth and final step is to select as BACT the most effective of the remaining technologies under consideration for each pollutant of concern. For the technologies determined to be feasible, there may be several different limits that have been set as BACT for the same control technology. The permitting agency has to choose the most stringent limit as BACT unless the applicant demonstrates in a convincing manner why that limit is not feasible. The final BACT determination would be the technology with the most stringent corresponding limit that is economically feasible. BACT must, at a minimum, be no less stringent than the level of control required by any applicable New Source Performance Standard (NSPS) and National Emissions Standard for Hazardous Air Pollutants (NESHAP) or state regulatory standards applicable to the emission units included in the permits.

The Office of Air Quality (OAQ) makes BACT determinations by following the five steps identified above.

| VOC BACT |

Step 1: Identify Potential Control Technologies

(a) Flares
(b) Vapor Recovery System
(c) Regenerative Thermal Oxidizers (RTO)
(d) Recuperative Thermal Incineration
(e) Catalytic Incinerators
(f) Refrigeration Systems
(g) Carbon Adsorbers
(h) Wet scrubber

Step 2: Eliminate Technically Infeasible Options

(a) Flares

Flaring is a volatile combustion control process for VOCs in which the VOCs are piped to a remote, usually elevated, location and burned in an open flame in the open air using a specially designed burner tip, auxiliary fuel, and steam or air to promote mixing for nearly complete (> 98%) VOC destruction.

An enclosed flare’s burner heads are inside a shell that is internally insulated. This shell reduces noise, luminosity, and heat radiation and provides wind protection. A high nozzle pressure drop is usually adequate to provide the mixing necessary for smokeless operation and air or steam assist is not required. In this context, enclosed flares can be considered a special class of pressure assisted or non-assisted flares. The height must be adequate for creating enough draft to supply sufficient air for smokeless combustion and for dispersion of the thermal plume. These flares are always at ground level. Enclosed flares generally have less capacity than open flares and are used to combust continuous, constant flow vent streams, although reliable and efficient operation
can be attained over a wide range of design capacity. Enclosed flares are typically found at landfills.

Flare is technically feasible to control the VOC emissions from EU1N.

(b) Vapor Recovery

Vapor Recovery Control is the control of VOC vapor emissions that occurs when natural gas liquid condensate transfer occurs from rail cars to trucks. Vapor recovery is the system used to capture vapors displaced from the truck tanks during these deliveries. The captured vapors are piped back into the empty space within the rail cars so they can be returned to the terminal for processing.

Vapor Recovery is technically feasible to control the VOC emissions from EU1N.

(c) Regenerative Thermal Oxidizers (RTO)

RTOs are add-on control devices to control VOC emissions by simple reaction of the harmful air pollutants with oxygen and heat. RTO uses a direct contact heat exchanger. These direct contact heat exchangers consist of a bed of porous ceramic packing or other structured, high heat capacity media.

Thermal Oxidizers require a steady flow rate of gases to be an effective control device. Savage’s operation would not provide a continuous flow rate of gases. The natural gasoline liquid condensate truck loading at EU1N is not a continuous process. Only one truck can be loaded at a time, and there are downtimes when the pump and hoses are being connected and disconnected to each truck. Additionally, there may not always be a truck at the facility ready to receive the condensate, so there can be wait times between loads, and each truck must check in with the office building before receiving any condensate. Therefore, RTO is not technically feasible to control the VOC emissions from EU1N. No further evaluation for a RTO will be conducted.

(d) Recuperative Thermal Incineration

A Recuperative Thermal Incinerator is an add-on control device to control VOC emissions by introducing VOC laden fume to the oxidizer. The stream is pre-heated by exiting flue gas from the same system in a heat exchanger or recuperator. A burner then heats the air to the required temperature of 600° F. The air is then passed through a catalytic bed where the VOC laden air is converted to carbon dioxide and water. These are then passed through the heat exchanger where incoming fume is preheated by the heat of the exiting flue gas. Finally, the clean flue gas is discharged into the atmosphere.

Thermal Oxidizers require a steady flow rate of gases to be an effective control device. Savage’s operation would not provide a continuous flow rate of gases. The natural gasoline liquid condensate truck loading at EU1N is not a continuous process. Only one truck can be loaded at a time, and there are downtimes when the pump and hoses are being connected and disconnected to each truck. Additionally, there may not always be a truck at the facility ready to receive the condensate, so there can be wait times between loads, and each truck must check in with the office building before receiving any condensate. Therefore, a Recuperative Thermal Incineration is not technically feasible to control the VOC emissions from EU1N. No further evaluation for a Recuperative Thermal Incineration will be conducted.

(e) Catalytic Incinerators

Catalytic oxidation is the process of oxidizing organic contaminants in a waste gas stream within a heated chamber containing a catalyst bed in the presence of oxygen for sufficient time to completely oxidize the organic contaminants to carbon dioxide and water. The catalyst is used to
lower the activation energy of the oxidation reaction. The residence time, temperature, flow velocity and mixing, the oxygen concentration, and type of catalyst used in the combustion chamber affect the oxidation rate and destruction efficiency. Catalytic oxidizers typically require combustion of an auxiliary fuel (e.g., natural gas) to maintain combustion chamber temperature high enough to completely oxidize the contaminant gases. Catalytic oxidizers operate at lower temperatures and require less fuel than thermal oxidizers, they have a smaller footprint, and they need little or no insulation. Catalytic oxidizers are typically designed to have a residence time of 0.5 seconds or less and combustion chamber temperatures between 600 and 1,200°F. The types of catalysts used include platinum, platinum alloys, copper chromate, copper oxide, chromium, manganese, and nickel. These catalysts are deposited in thin layers on an inert substrate, usually a honeycomb shaped ceramic. The two types of catalytic oxidation systems include recuperative and regenerative catalytic oxidizers, which are differentiated by the type of heat recovery equipment used. In a recuperative catalytic oxidizer, the waste gas stream is preheated using the heat content of the treated gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In a regenerative thermal oxidizer, a high-density media such as a packed ceramic bed, which was heated in a previous cycle, is used to preheat the incoming waste gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings.

Based on EPA’s Air Pollution Control Fact Sheet for Catalytic Incinerators, typically gas flow rate for packaged catalytic incinerators are 700 to 50,000 scfm. The gas flow rate at EU1N is approximately 4 scfm when in operation. This low flow rate does not provide enough gas to make a catalytic incinerator a feasible control technology. Therefore, Catalytic Incineration is not technically feasible to control the VOC emissions from EU1N. No further evaluation for Catalytic Incineration will be conducted.

(f) Refrigeration Systems

Refrigerated Condensation is the separation of VOCs from an emission stream through a phase change, by either increasing the system pressure or, more commonly, lowering the system temperature below the dew point of the VOC vapor. When condensers are used for air pollution control, they usually operate at the pressure of the emission stream, and typically require a refrigeration unit to obtain the temperature necessary to condense the VOCs from the emission stream. Refrigeration systems are add-on control devices to control VOC emissions with high VOC concentrations (usually greater than 5,000 ppmv).

Refrigeration Systems is technically feasible to control the VOC emissions from EU1N.

(g) Carbon Adsorbers

Adsorption is a process by which VOC is retained on a granular carbon surface, which is highly porous and has a very large surface-to-volume ratio. Carbon adsorption systems can operate in two phases: adsorption and desorption. Adsorption is rapid and removes most of the VOCs in the stream. Eventually, the adsorbent becomes saturated with the vapors and the system’s efficiency drops. The adsorbent must be regenerated or replaced soon after efficiency begins to decline. In regenerative systems, the adsorbent is reactivated with steam or hot air in order to desorb the absorbate (VOC vapors) from the adsorbent and the adsorbate and regenerated absorbent can be recovered for reuse or disposal. Non-regenerative systems require the removal of the spent adsorbent and replacement with fresh adsorbent.

At equilibrium, the quantity of VOC that is adsorbed on activated carbon is a function of the adsorption temperature and pressure, the chemical species being adsorbed, and the carbon characteristics, such as carbon particle size and pore structure. The adsorptivity increases with increasing VOC partial pressure and decreases with increasing temperature.

Carbon Adsorbers is technically feasible to control the VOC emissions from EU1N.
(h) Wet scrubber

A wet packed bed scrubber is an absorption system in which a waste gas stream is interacted with a scrubbing liquid inside a contact chamber containing a bed of packing media in order to strip contaminant gases from the waste gas stream through the process of dissolution. Water is the most commonly used scrubbing liquid. Other solvents may be used depending on the components of the waste gas stream. Since the VOC is not destroyed in the scrubber, additional pollution control would be necessary. Based on EPA’s Air Pollution Control Fact Sheet for Spray-Tower Wet Scrubbers, typically gas flow rate for wet scrubbers are 1,500 to 100,000 scfm (Cooper, 1994). The gas flow rate at EU1N is approximately 4 scfm when in operation. This low flow rate does not provide enough gas to make a Wet scrubber a feasible control technology. Therefore, Wet scrubber is not technically feasible to control the VOC emissions from EU1N. No further evaluation for a Wet Scrubber will be conducted.

Step 3: Rank the Remaining Control Technologies by Control Effectiveness

Based on the technical feasibility analysis in Step 2, the remaining control technologies are ranked as follows:

<table>
<thead>
<tr>
<th>Ranking</th>
<th>Technology</th>
<th>Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Flare</td>
<td>98.0%</td>
</tr>
<tr>
<td>2</td>
<td>Vapor Recovery System</td>
<td>95.0%</td>
</tr>
<tr>
<td>2</td>
<td>Carbon Adsorbers</td>
<td>95.0%</td>
</tr>
<tr>
<td>3</td>
<td>Refrigeration Systems</td>
<td>90.0%</td>
</tr>
</tbody>
</table>

Step 4. Evaluate Most Effective Controls and Document Results

A review of EPA’s RACT/BACT/LAER Clearinghouse (RBLC) and Indiana Air Permits identified the following previous BACT determinations for similar sources:

<table>
<thead>
<tr>
<th>Process</th>
<th>RBLC ID</th>
<th>Facility</th>
<th>Permit Issuance Date</th>
<th>Production Capacity</th>
<th>VOC Limit</th>
<th>Control</th>
</tr>
</thead>
<tbody>
<tr>
<td>Savage Services</td>
<td>--</td>
<td>liquid truck loading operation (EU1N)</td>
<td>--</td>
<td>11,223 gal/hr</td>
<td>95% overall reduction efficiency (including collection and control efficiency) and 8.98 tons VOC per twelve (12) consecutive month period</td>
<td>submerged fill and vapor recovery system</td>
</tr>
<tr>
<td>Comparable BACT Determinations</td>
<td></td>
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</tr>
<tr>
<td>SemGas Rose Valley Plant</td>
<td>OK-0153</td>
<td>Condensate Truck Loading</td>
<td>03/01/2013</td>
<td>1,050 gal/hr</td>
<td>7.06 tons per year</td>
<td>Flare</td>
</tr>
<tr>
<td>Gulf Crossing Pipeline Co.</td>
<td>LA-0232</td>
<td>Truck Loading of Condensate</td>
<td>06/24/2008</td>
<td>28 gal/hr</td>
<td>26.1 lb/hr, 1.31 tons VOC per year</td>
<td>Submerged Loading</td>
</tr>
</tbody>
</table>
### Process RBLC ID Facility Permit Issuance Date Production Capacity VOC Limit Control

| Ohio Valley Resources, LLC | IN-0179 Diesel Exhaust Fluid Truck Loadout | 09/25/2013 | 6,300 gal/hr | Not specified in RBLC | Use of Submerged Fill |

Enclosed Flare at SemGas Rose Valley Plant has 68.6% overall control efficiency (70% collection efficiency and 98% destruction efficiency). Since the overall control efficiency of the flare at SemGas Rose Valley Plant is lower than overall control efficiency of Vapor Recovery System, the flare option is not considered for Savage Services. The loading operation EU1N has been constructed and operated without a permit. The source has a submerged fill and vapor recovery system installed already for this unit. Since Carbon Adsorbers and Refrigeration Systems achieve lower level of control compared to the existing submerged fill and vapor recovery system, Carbon Adsorbers and Refrigeration Systems cost analysis has not been performed. The proposed BACT is consistent with the other recent BACT determinations in EPA’s RACT/BACT/LAER clearinghouse.

**Savage Services Proposed VOC BACT for EU1N:**

(a) The VOC emissions from EU1N shall be controlled by submerged fill and vapor recovery control.

(b) The minimum overall VOC reduction efficiency (including collection and control efficiency) for the submerged fill and vapor recovery system shall be 95%.

(c) The VOC emissions from EU1N shall not exceed 8.98 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

VOC limit is calculated as follows:

\[
\text{VOC Limit (tons/12 consecutive month period)} = \text{Uncontrolled VOC Emissions (tons/12 consecutive month period)} \times \left[1 - \frac{\text{overall VOC reduction efficiency}}{100}\right]
\]

\[
= 179.5 \times \left[1 - \frac{95}{100}\right]
\]

\[
= 8.98 \text{ (tons/12 consecutive month period)}
\]

**Step 5: Select BACT**

Pursuant to 326 IAC 8-1-6, IDEM, OAQ has established VOCs BACT for EU1N as follows:

(a) The VOC emissions from EU1N shall be controlled by submerged fill and vapor recovery control.

(b) The minimum overall VOC reduction efficiency (including collection and control efficiency) for the submerged fill and vapor recovery system shall be 95%.

(c) The VOC emissions from EU1N shall not exceed 8.98 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

**IDEM Contact**

Questions regarding this proposed permit can be directed to Mehul Sura at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-6868 or toll free at 1-800-451-6027 extension 3-6868.
August 22, 2019

Mr. Adam Virosztko  
Savage Services  
3600 Gibson Transfer Road  
Hammond, IN 46323

Re: Public Notice  
Savage Services  
Permit Level: New Source Construction and Federally Enforceable State Operating Permit (FESOP)  
Permit Number: 089-41538-00607

Dear Mr. Virosztko:

Enclosed is a copy of your draft New Source Construction and Federally Enforceable State Operating Permit (FESOP), Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Hammond Public Library, 564 State Street in Hammond, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Mehul Sura, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension (317) 233-6868 or dial (317) 233-6868.

Sincerely,

Vivian Haun  
Vivian Haun  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 4/12/19
August 22, 2019

To: Hammond Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Savage Services
Permit Number: 089-41538-00607

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.
Notice of Public Comment

August 22, 2019
Savage Services
089-41538-00607

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter 4/12/2019
Mail Code 61-53

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<th>Insured Value</th>
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<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
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<tr>
<td>1 Adam Virosztko</td>
<td>Savage Services 3600 Gibson Transfer Rd Hammond IN 46323 (Source RM)</td>
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<td>2 Jose Fernandez</td>
<td>Vice President Savage Services 152 E High St Pottstown PA 19464 (RO RM)</td>
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<td>8 Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)</td>
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<td>14 Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)</td>
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<tr>
<td>15 Mr. Thomas M. McDermott, Jr. City of Hammond 5925 Calumet Avenue Hammond IN 46320 (Affected Party)</td>
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<table>
<thead>
<tr>
<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<td>1</td>
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<td>Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)</td>
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<td>Norfolk Southern Railway Company 3 Commercial Place Box 209 Norfolk VA 23510 (Affected Party)</td>
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<td>Mark Coleman PO Box 85 Beverly Shores IN 46301-0085 (Affected Party)</td>
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<td></td>
<td>Ms. Pat Sorensen Environmental Resources Management (ERM) 8425 Woodfield Crossing, Suite 560-W Indianapolis IN 46240 (Consultant)</td>
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<td>Jeff Mayes News-Dispatch 422 Franklin St Michigan City IN 46360 (Affected Party)</td>
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<td>State of Indiana Dept of Natural Resources 601 State Office Building Indianapolis IN 46204 (Affected Party)</td>
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<td>Linde Gas North America LLC 6055 Rockside Woods Blvd Independence MO 44131 (Affected Party)</td>
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<td>Jenna Vanderbosch Environmental Resources Management (ERM) 8425 Woodfield Crossing Blvd, Suite 560-W Indianapolis IN 46240 (Consultant)</td>
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Total number of pieces Listed by Sender: 9

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