INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 1, 2024

VIA ELECTRONIC MAIL
Mark Mandel
Cummins, Inc. – Midrange Engine Plant
2725 W CR 450 South
Columbus, IN 47201
mark.e.mandel@cummins.com

Re: Inspection Summary Letter
Cummins, Inc. – Midrange Engine Plant
Source ID 005-00047
Walesboro, Bartholomew County

Dear Mark Mandel:

On June 20, 2024, I, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Cummins, Inc. – Midrange Engine Plant, located at 2725 W CR 450 South in Walesboro, Indiana. The inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment
Inspection Results: No violations were observed

Please direct any questions to Vaughn Ison, Compliance Inspector, at 317-233-0432 or by email at vison@idem.IN.gov.

Sincerely,

Vaughn Ison

Vaughn Ison, Compliance Inspector
Compliance Section 1
Office of Air Quality

ACES ID: 298682

ENCLOSURE

cc: Vaughn Ison, Compliance and Enforcement Branch, Office of Air Quality
Tyler Lenahan, T & M Associates – ti064@cummins.com

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT

SOURCE INFORMATION	
SOURCE NAME	Cummins, Inc. – Midrange Engine Plant
SOURCE LOCATION	2725 W CR 450 South, Walesboro, Indiana Bartholomew County
MAILING ADDRESS	2725 W CR 450 South, Columbus, IN 47201
PLANT ID	005-00047
PERMIT INFORMATION	Permit Type: TVOP Permit Number: 46639 Permit Expiration Date: 11/7/2027 VFC Document No.(hyperlink): 83509668
ATTAINMENT STATUS	☒ Attainment for all criteria pollutants ☐ Nonattainment for ☐SO_2 ☐CO ☐O_3 ☐NO_2 ☐Pb ☐PM_{10} ☐$PM_{2.5}$
SOURCE STATUS	☐ PSD Major (326 IAC 2-2) ☐ Major Source of HAPs ☐ Emission Offset (326 IAC 2-3) ☒ Area Source of HAPs ☐ Acid Rain (326 IAC 21)
SOURCE DESCRIPTION	Cummins, Inc. – Midrange Engine Plant (CMEP) operates a stationary internal combustion engine assembly, painting, and testing facility.

INSPECTION INFORMATION			
INSPECTED BY	Vaughn Ison		
INSPECTION DATE AND TIME	June 20, 2024	TIME IN: 9:30	TIME OUT: 11:25
REPORTED BY	Vaughn Ison	REPORT DATE: June 25, 2024	
COMPLIANCE PERIOD REVIEWED	Since most recent inspection		
INSPECTION NOTIFICATION	☐ Unannounced	☒ Announced: CMEP is an ESP member that requested advanced notice of inspections. As such, I phoned ahead and scheduled the inspection.	
INSPECTION OBJECTIVE(S)	☒ Compliance Monitoring Strategy (CMS) ☐ Mega-Site: ☐ FCE ☐ PCE ☐ Other:	☐ Commitment ☐ Complaint ☐ Surveillance	
ACES TRACKING NUMBER(S)	Inspection: 298682	Complaint: N/A	Violation/Warning:
RM TRACKING NUMBER(S)	Complaint: N/A		
INSPECTION BACKGROUND	The most recent inspection occurred on 7/21/2022 resulting in an enforcement referral for the failure to submit a timely renewal application. I found no evidence of a complaint filed against the source.		

SOURCE PERSONNEL INTERVIEWED			
Name	*Title*	*Phone Number*	*Email Address*
Mark E. Mandel (via phone)	HSE - Global Logistics	812-343-9754	mark.e.mandel@cummins.com
Tyler Lenahan	T & M Associates (Consultant)	317-753-4090	ti064@cummins.com
Keri Harris		812-314-5377	kd059@tandmassociates.com
JR McKinley		812-314-9446	ih905@tandmassociates.com

SOURCE PERSONNEL INTERVIEWED			
Aaron Cook		765-464-9185	tn171@cummins.com
Kareem El-Refal	Plant Manager	502-753-9744	jz581@cummins.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	*Inspection/Complaint Type*	*Result*	*Comments*
7/21/2022	CMS	Violations Noted	Failure to timely submit a renewal application
7/16/2020	CMS	No Violations Noted	

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	*Action Taken*	*Describe Violation(s)*	
5/10/2024	Violation Letter	Failure to submit timely annual permit fees	
12/16/2021	Violation Letter	Failure to record daily filter inspections – few days	
8/9/2021	Violation Letter	Failure to record daily filter inspections – three non-consecutive days	
5/6/2020	Violation Letter	Failure to submit timely annual permit fees	
7/31/2019	Violation Letter	Failure to submit timely annual permit fees, to perform daily filter inspections, and the failure to maintain VE notations for one day	
2/17/2018	Violation Letter	Failure to record VE notations on two days	
Formal Enforcement Actions			
Case Number	*Enforcement Type*	Civil Penalty	Describe Violation(s)
2022-28880-A	Expedited Enforcement	$ 500	Failure to timely submit a renewal application
Other Relevant Actions			
Action Taken	*Comments*		
N/A			

PERMIT SECTION D.1		
Emission Units and Control Devices:		
One (1) paint spray booth, identified as EU-P01, constructed in 1991, approved in 2023 for modification, equipped with four (4) robotic spray applicators and one (1) manual spray applicator, with a maximum capacity of 45 engines per hour, using dry filters as control, and exhausting to stack S01. One (1) spray application of rust preventer, identified as Rust Preventative Spray, constructed in 2000, modified in 2017, approved in 2023 for modification, using a robotic spray application, with a maximum capacity of 45 units per hour and 0.004 gallons per unit, using no control, and exhausting indoors		
Pollutants with Emission Limits or Applicable Standards:		
☐ SO_2 ☐ NO_X ☐ CO ☒ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☒ HAPS		
Applicable Rules:		
• 3236 IAC 6-3, 8-1, & 8-2		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No

PERMIT SECTION D.1		
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: VOC and HAP content and use Monthly coating and solvent use Weekly observations and daily and monthly overspray		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

During the inspection, I observed no visible emissions or evidence of overspray. I perused the PMP and observed no violations.
CMEP shall not allow the discharge of VOC exceeding 4.3 pounds for clear coats and 3.5 pounds of VOC per gallon of coating excluding water. The SDS affirms the VOC content of 1.1 pounds per gallon, and CMEP no longer uses clear coats.
The VOC input to the rust preventive spray must remain lower than 15 lbs/day of VOC. CMEP's VOC input ranged from 0 to 13 pounds/day of VOC.
I observed no open containers of VOC-containing materials.
The input of a single HAP shall be less than 5 tons/12 consec month period, and the input of a combination of HAPs shall be less than 10 tons/12 consec month period. CMEP complies with said limits.
Dry filters controlled PM emissions from the booth when it operates. Filters were in place and adequately controlled emissions during the inspection.
CMEP maintained records of daily filter inspections and weekly and monthly inspections. The records were complete and performed on dates that comply with the permit-based deadlines.

Emission Unit or Control Device	*Parameter*	*Permitted Value/Range*	*Observation*
Paint Spray Booth (EU-P01)	Dry Filters	Good operating condition	Good shape

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.2		

Emission Units and Control Devices:

Five (5) diesel or biodiesel (B1 – B20) – powered engine test cells, collectively identified as EU-P02, four (4) constructed in 1991 and one (1) constructed in 2005, with a combined maximum capacity of 655,949 gallons of diesel fuel per year, using no control, and exhausting to stack S02.

Five (5) diesel or biodiesel (B1 – B20) – powered engine test cells, collectively identified as EU-P02, four (4) constructed in 1991 and one (1) constructed in 2005, with a combined maximum capacity of 655,949 gallons of diesel fuel per year, using no control, and exhausting to stack S02.

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☒ NO_X ☒ CO ☐ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 5-1

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No

PERMIT SECTION D.2		
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements – 2/9/2022	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: Daily visible emissions notations		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

The test cells operated during the inspection. I saw no visible emissions. I perused the PMP and determined its adequacy.
For PSD avoidance, the fuel usage for EU-PO2 and EU-PO3 shall not exceed 475,000 gallons per 12 consecutive month period. Moreover, NOx emissions from P03 shall not exceed 0.61 pounds per gallon of diesel fuel used. Quarterly reports and records reviewed indicate no violations as they used 63,187 gallons per 12 consecutive month period. The 2/9/2022 stack test demonstrated the measured NOx emission rate of 0.099 lbs/gal.
CMEP uses 100% low-sulfur diesel fuel and complies with the usage limit.
CMEP records visible emissions notations. The records were complete with no abnormal notations recorded.

Emission Unit or Control Device	*Parameter*	*Permitted Value/Range*	*Observation*
Test Cells	Visible Emissions	Normal/Abnormal	No violations

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.3

Emission Units and Control Devices:

Two Natural Gas-fired Boilers, collectively identified as EU-B01, constructed in 1972, with a maximum capacity of 61.5 MMBtu/hr each, using no controls, and exhausting to stack S10.

Natural gas-fired combustion sources with heat input capacity equal to or less than ten million (10,000,000) British thermal units per hour (10 MMBtu/hr), and consisting of the following:
One (1) Natural Gas-fired Boiler, identified as B1, constructed in 1993, with a heat input capacity of 8.369 MMBtu/hr, using no controls and exhausting to a stack.
Three (3) Rooftop Air Handling Units, collectively identified as RTU-B, constructed in 2017, with a maximum heat input capacity of 0.72 MMBtu/hr each, using no controls, and exhausting to the atmosphere.
Fifteen (15) Rooftop Air Handling Units, collectively identified as RTU-H, constructed in 2017, with a maximum heat input capacity of 0.40 MMBtu/hr each, using no controls, and exhausting to the atmosphere.
Eighteen (18) Dock Heaters, collectively identified as H1, with a maximum heat input capacity of 0.40 MMBtu/hr each, using no controls, and exhausting to the atmosphere.
One (1) Natural Gas-fired Heater, identified as Cafe Heater, constructed in 2015, with a maximum heat input capacity of 1.00 MMBtu/hr, using no controls, and exhausting to the atmosphere.
One (1) Natural Gas-fired Heater, identified as Wash Line Dryer, constructed in 2015, with a maximum heat input capacity of 2.25 MMBtu/hr, using no controls, and exhausting to the atmosphere.
One (1) Natural Gas-fired Oven, identified as Cure Oven, constructed in 2015, with a maximum heat input capacity of 3.15 MMBtu/hr, using no controls, and exhausting outdoors.
One (1) Natural Gas-fired Air Handling Unit, identified as Vis-AHU, constructed in 2017, with a maximum heat capacity of 0.45 MMBtu/hr, using no controls and exhausting to the atmosphere.
Three (3) natural gas-fired boilers, collectively identified as B2, constructed in 2019, each with a maximum heat input capacity of 2.00 MMBtu per hour, using no control, and exhausting outdoors

PERMIT SECTION D.3

One (1) indirect natural gas-fired air handling unit located in the cafeteria, identified as RT-6, constructed in 2021, with a maximum heat input capacity of 1.00 MMBtu per hour, using no control, and exhausting indoors
One (1) indirect natural gas-fired air handling unit, identified as AHU-T27, constructed in 2017, with a maximum heat input capacity of 0.45 MMBtu per hour, using no control, and exhausting outdoors

One (1) Cooling Tower, identified as CT1, constructed in 2017, with a maximum flow rate of 792 kilo-gallons per hour, using no controls, exhausting to a stack, and consisting of the following:
One (1) Cooling Tower Unit Heater, identified as UH-A, constructed in 2017, with a maximum heat input capacity of 0.15 MMBtu/hr, using no controls, and exhausting to a stack.
One (1) Cooling Tower Unit Heater, identified as UH-B, constructed in 2017, with a maximum heat input capacity of 0.25 MMBtu/hr, using no controls, and exhausting to a stack.
One (1) Cooling Tower Water Heater, identified as WH-1, constructed in 2017, with a maximum heat input capacity of 0.15 MMBtu/hr, using no controls, and exhausting to a stack.

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 6-2

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

The plant operated during the inspection. I perused the PMP and determined its adequacy.
The boilers collectively known as EU-BO1 are no longer in service. In fact, CMEP is in the process of dismantling the boilers. Fuel supply has been disconnected as well as other piping. Mr. Lenahan said the boilers should be completely removed by the end of the year of thereabouts.
CMEP only uses natural gas for fuel. The source alternates boiler usage on a monthly basis depending on needs. During the summer, the only units functioning are those needed for the process. In the winter, the heating units are also used for building heat.
Fuel oil has not been used in this facility for years.

Emission Unit or Control Device	*Parameter*	*Permitted Value/Range*	*Observation*
N/A			

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.4

Emission Units and Control Devices:

Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6, 6, and consisting of the following:

PERMIT SECTION D.4

Three (3) Degreasers, identified Maintenance, Machine Area A18, and Forklift Maintenance C7, constructed after 1990, with a maximum solvent usage of 35 gallons per year, using no controls, and exhausting indoors.
One (1) Degreaser, identified as Unit 45, constructed after 1990, with a maximum solvent usage of 45 gallons per year, using no controls, and exhausting indoors.
(3) One (1) Degreaser, identified as COM-200, constructed after 1990, with a maximum solvent usage of 40 gallons per year, using no controls, and exhausting indoors.

Five (5) pre-coating parts washing operation, approved in 2023 for construction, using no control, and exhausting indoors, as follows:
Stage 1 – 4 using material Houghton Clean 8170 with a maximum capacity 6336 gallons/year, and
Stage 5 using Houghton LUPREP 601 with a maximum capacity of 3960 gallons/year.

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☒ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 8-3

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: Solvent supplier Solvent purchasing, type, and volume of solvent purchased Solvent vapor pressure		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

All parts washers are solvent based.
During the inspection, all parts washers were equipped with conspicuous labels for operating instruction.
All parts washers were observed with their lids closed.
The solvent used in the degreasers comply with the VOC composite partial vapor pressure requirement of less than 1 mm of mercury at 20° C. In fact, the vapor pressure equaled 0.7 mm of Hg.
All waste solvents were stored in covered containers during the inspection.
I perused the PMP and determined its adequacy.

Emission Unit or Control Device	*Parameter*	*Permitted Value/Range*	*Observation*
Cold-cleaning degreasers	Cover	Cover closed	Closed

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.1

Emission Units and Control Devices:

Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one (1) stationary source exceeds two million (2,000,000) British thermal units per hour, and consisting of:

PERMIT SECTION E.1

One (1) diesel-fired emergency generator, identified as ITGEN, constructed in 2012, with a maximum capacity of 175 horsepower, using no control, and exhausting outdoors.

One (1) diesel-fired emergency generator, identified as MAINGEN, constructed in 2013, with a maximum capacity of 671 horsepower, using no control, and exhausting outdoors.

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☒ NO_X ☒ CO ☐ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rule:

40 CFR 60, Subpart IIII

Applicability Information:

Generators installed after 7/11/2005 at an area source

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: Fuel Specifications Maintenance/oil changes Good air pollution control practices and procedures Hour use		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

The generator and fire pump operate for approximately 30 minutes each week as part of readiness and maintenance testing. The source operates roughly for 30 hours per year which is within the 100-hour generator usage limitations.
A consultant performs yearly maintenance on the generator. Records of yearly maintenance checks were available on the day of inspection. Preventive maintenance is performed to ensure the engine is performing according to manufacturer's specifications.
CMP does not conduct power sharing with the generators.
Source uses low sulfur fuel containing less than 15 ppm sulfur content according to documentation viewed on the day of inspection.
According to the source, the generator is operated and maintained, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.
Preventive maintenance is performed to ensure that the engine is performing according to manufacturer's specifications. Compliance with the emission standards is accomplished by maintaining the engine according to manufacturer's written instructions.
Source's Cummins generator is certified to meet EPA Tier 4 emissions standards.
I perused the PMP and determined its adequacy.

Emission Unit or Control Device	*Parameter*	*Permitted Value/Range*	*Observation*
N/A			

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.2

Emission Units and Control Devices:

Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one (1) stationary source exceeds two million (2,000,000) British thermal units per hour, and consisting of:

One (1) diesel-fired emergency generator, identified as ITGEN, constructed in 2012, with a maximum capacity of 175 horsepower, using no control, and exhausting outdoors.
One (1) diesel-fired emergency stationary fire pump, identified as FP-1, constructed in 1997, with a maximum capacity of 280 horsepower, using no control, and exhausting outdoors.
One (1) diesel-fired emergency generator, identified as MAINGEN, constructed in 2013, with a maximum capacity of 671 horsepower, using no control, and exhausting outdoors.

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☒ HAPS

Applicable Rule:

40 CFR 63, Subpart ZZZZ

Applicability Information:

An emergency generator is used at a minor source of HAPs.

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: Fuel Specifications Maintenance/oil changes Good air pollution control practices and procedures Hour use		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

CMEP meets the requirements of 40 CFR 63, Subpart ZZZZ by complying with the requirements of 40 CFR 60, Subpart IIII.

Emission Unit or Control Device	*Parameter*	*Permitted Value/Range*	*Observation*
N/A			

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.3

Emission Units and Control Devices:

One (1) Gasoline Fuel Transfer and Dispensing Operation, identified as Gasoline, constructed in 2005, handling less than or equal to 1,300 gallons per day for the filling of tanks, locomotives, or automobiles, having a storage capacity of less than or equal to 10,500 gallons, and consisting of:

PERMIT SECTION E.3

- (1) One gasoline tank, identified as Gas Tank, constructed in 2005, with a maximum dispensing rate of fifteen (15) gallons per minute and a maximum storage capacity of three hundred (300) gallons, using no controls, and exhausting to the atmosphere.

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☒ HAPS

Applicable Rule:

40 CFR Subpart CCCCCC

Applicability Information:

CMEP operates a gasoline dispensing facility at an area source of HAPs

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: Maintenance performed Gallons dispensed		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

CMEP dispenses less than 10,000 gallons of gasoline per month. As such, the following requirements apply:
(1) Minimize gasoline spills;
(2) Clean up spills as expeditiously as practicable;
(3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
(4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
The source complies with the aforementioned requirements.
CMEP maintains gasoline monthly throughput records.

Emission Unit or Control Device	*Parameter*	*Permitted Value/Range*	*Observation*
N/A			

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

ADDITIONAL SOURCE COMPLIANCE REVIEW:

The following reports are required and were reviewed:

☒ Annual Compliance Certification(s) ☒ Deviation & Compliance Monitoring Report(s)
☐ Annual Notification(s) ☐ Emission Statement(s)

The reports are consistent with inspection observations.	☒ Yes ☐ No ☐ N/A
The permit accurately represents emission units observed on site.	☐ Yes ☒ No ☐ N/A
Compliance assistance was provided during the inspection.	☐ Yes ☒ No ☐ N/A
The source is required to have a Risk Management Plan [40 CFR 68].	☐ Yes ☒ No
If yes, the source has a plan.	☐ Yes ☐ No ☒ N/A

ADDITIONAL SOURCE COMPLIANCE REVIEW:
If yes, the employees have been trained. ☐ Yes ☐ No ☒ N/A
Additional Information and Comments:
The boilers collectively known as EU-BO1 are no longer in service. In fact, CMEP is in the process of dismantling the boilers. Fuel supply has been disconnected as well as other piping. Mr. Lenahan said the boilers should be completely removed by the end of the year or thereabouts.
Additional Source Compliance Review Status:
☒ No violations were observed or determined for this permit section at the time of the inspection. ☐ The following violations were determined for this permit section at the time of the inspection:

INSPECTION FINDINGS	
☒ No violations were observed or determined at the time of the inspection. ☐ The following violations were determined at the time of the inspection: .	
RECOMMENDED ACTION	Issue inspection summary letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Mr. Lenahan and the others prior to exiting the facility.