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 3, 2024

VIA ELECTRONIC MAIL
Matthew Powell
Veregy IN LLC
2745 S Hoffman Road, Suite 504
Indianapolis, IN 46241
mpowell@veregy.com

Re: Inspection Summary Letter
Veregy IN LLC
Source ID 097-00586
Indianapolis, Marion County

Dear Matthew Powell:

On June 20, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Veregy IN LLC, located at 2745 S Hoffman Road in Indianapolis, Indiana. This 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 me at (317) 694-8691 or by email at jbautist@idem.in.gov.

Sincerely,

Johnathan Bautista, Compliance Inspector
Compliance Section 2
Office of Air Quality

ACES ID: 298587 (Inspection)

cc: Johnathan Bautista, Compliance and Enforcement Branch, Office of Air Quality

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

SOURCE INFORMATION	
SOURCE NAME	Veregy IN LLC
SOURCE LOCATION	2745 S Hoffman Road, Indianapolis, Indiana 46241 Marion County
MAILING ADDRESS	2745 S Hoffman Road, Suite 504, Indianapolis, IN 46241
PLANT ID	097-00586
PERMIT INFORMATION	Permit Type: TVOP Permit Number: 097-47735-00586 Permit Expiration Date: 03/09/2025 VFC Document No.(hyperlink): 83637821
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	The Permittee owns and operates a stationary central energy plant.

INSPECTION INFORMATION			
INSPECTED BY	Johnathan Bautista		
INSPECTION DATE AND TIME	June 20, 2024	TIME IN: 10:00 AM	TIME OUT: 11:15 PM
REPORTED BY	Johnathan Bautista	REPORT DATE: 07/01/2024	
COMPLIANCE PERIOD REVIEWED	2022 to 2024		
INSPECTION NOTIFICATION	☒ Unannounced ☐ Announced:		
INSPECTION OBJECTIVE(S)	☒ Compliance Monitoring Strategy (CMS) ☐ Commitment ☐ Mega-Site: ☐ FCE ☐ PCE ☐ Complaint ☐ Other: ☐ Surveillance		
ACES TRACKING NUMBER(S)	Inspection: 298587	Complaint: N/A	Violation/Warning: N/A
RM TRACKING NUMBER(S)	Complaint: N/A		

INSPECTION BACKGROUND

- Purpose of Inspection: To fulfill the Compliance Monitoring Schedule (CMS) and determine compliance with the company's air permit and the state's air rules.
- The following permits were active during the compliance period:

Permit #	Permit Type	Issue Date
097-47735-00586	TV AA/Modification/Other	05/14/2024
097-42913-00586	TV AA/Modification/Other	02/02/2021

Less than 7 employees work at the facility. The facility operates 24 hours per day, seven (7) days per week.

SOURCE PERSONNEL INTERVIEWED			
Name	*Title*	*Phone Number*	*Email Address*
Matt Powell	Director	317-903-9546	mpowell@veregy.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	*Inspection/Complaint Type*	*Result*	*Comments*
04/14/2022	CMS	No Violations Noted	None.
03/03/2020	CMS	No Violations Noted	None.

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)		
Informal Enforcement Actions		
Date Issued	*Action Taken*	*Describe Violation(s)*
05/20/2024	Violation Letter	The Annual Compliance Certification (ACC), required to be submitted no later than April 15, 2024, was submitted on April 29, 2024, in violation of Permit 097-42040-00565 Condition B.9(a).
Formal Enforcement Actions		
No enforcement actions were taken against the source in the previous five (5) years.		
Other Relevant Actions		
Action Taken	*Comments*	
N/A	None.	

PERMIT SECTION D.1: Natural Gas Boilers
Emission Units and Control Devices:

Emissions Unit Description:

(a) Natural gas-fired Boiler #1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing Jet A fuel or No. 2 fuel oil during periods of gas curtailment, gas supply interruption, startups and periodic testing pursuant to 40 CFR 63.11237, Subpart JJJJJJ, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 001, installed in 1993.
[40 CFR 60, Subpart Dc]

(b) Natural gas-fired Boiler #2, manufactured by Superior Boiler Works, Inc., identified as emission unit 002, with the capability of firing Jet A fuel or No. 2 fuel oil during periods of gas curtailment, gas supply interruption, startups and periodic testing pursuant to 40 CFR 63.11237, Subpart JJJJJJ, with a maximum heat input capacity of 25.2 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 002, constructed in 2016.
[40 CFR 60, Subpart Dc]

(c) Natural gas-fired Boiler #3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing Jet A fuel or No. 2 fuel oil only during periods of gas curtailment, gas supply interruption, startups and periodic testing pursuant to 40 CFR 63.11237, Subpart JJJJJJ, with a maximum heat input capacity of 122 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, with continuous emission monitoring systems (CEMS), exhausting to one stack, identified as stack 003, installed in 1994.
[40 CFR 60, Subpart Db]

PERMIT SECTION D.1: Natural Gas Boilers

(d) Natural gas-fired Boiler #4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing Jet A fuel or No. 2 fuel oil only during periods of gas curtailment, gas supply interruption, startups and periodic testing pursuant to 40 CFR 63.11237, Subpart JJJJJJ, with a maximum heat input capacity of 122 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, with continuous emission monitoring systems (CEMS), exhausting to one stack, identified as stack 004, installed in 1994. [40 CFR 60, Subpart Db]

Pollutants with Emission Limits or Applicable Standards:

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

Applicable Rules:

- 326 IAC 2-3: Emission Offset (SO2)
- 326 IAC 7-1.1-2: Sulfur dioxide emission limitations (SO2)
- 326 IAC 2-2: Prevention of Significant Deterioration (PSD) Requirements (CO)(NOx)
- 326 IAC 6.5-1-2(b)(2): Particulate emission limitations; modification by commissioner (PM)
- 326 IAC 6.5-1-2(b)(3): Particulate emission limitations; modification by commissioner (PM)

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: Fuel usage records, Fuel certification records, VENs, PMP		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

PSD Minor Limit

- The combustion of Jet A fuel, No. 2 fuel oil and/or Jet A off-spec fuel in Boiler #1, Boiler #2, Boiler #3, and Boiler #4 to a combined total of fewer than 5,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. The quarterly summary reports confirmed no deviations from the combustion of the fuels used for the boilers.
  - The source complies with Conditions D.1.1(a) and D.1.11

- Source-wide SO2 emissions to less than 250 tons per twelve (12) consecutive month period.
  - The source complies with Condition D.1.1.

Sulfur Dioxide (SO2) Limit

Compliance Determination Requirements

- Veregy demonstrated that the sulfur dioxide emissions do not exceed 0.5 pounds MMBtu heat input by providing vendor analysis of fuel delivered accompanied by a vendor certification.
  - Source complies with Conditions D.1.6 and D.1.2.

PERMIT SECTION D.1: Natural Gas Boilers

PSD Minor Limit

- NOx emissions from Boiler #1, Boiler #2, Boiler #3, and Boiler #4 at IMCCEP, Plant 2, were less than a combined total of 74.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The quarterly summary reports confirmed no deviations in the NOx emissions limitations for the boilers.
    - The source complies with Conditions D.1.3(a) and D.1.11.

- CO emissions from Boiler #1, Boiler #2, Boiler #3, and Boiler #4 at IMCCEP, Plant 2, were less than a combined total of 85.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The quarterly summary reports confirmed no deviations in the CO emissions limitations for the boilers.
    - The source complies with Conditions D.1.3(b) and D.1.11.

PM Limitations

- Boiler #1, Boiler #2, Boiler #3, and Boiler #4 were observed during the inspection but were not operating. Mr. Powell stated that the boiler does not operate during the summer. No visible emission was noticed and observed units appeared to be in good working order.

PMP

- A Preventative Maintenance Plan (PMP) for the facility and control equipment was reviewed and found to be adequate. The source uses an online application called *Infor* for keeping track of maintenance.
    - The source complies with Conditions D.1.5, D.3.2, and B.10.

Continuous Emission Monitoring (CEMS)

- Veregy installed, calibrated, maintained, and operated all necessary continuous emission monitoring systems (CEMS) and related equipment for NOx emissions on stack 003 and stack 004 for Boiler #3, and Boiler #4 that meet all applicable performance specifications of 326 IAC 3- 5-2.
    - The source complies with Condition D.1.7(a)

- All CEMS meet all applicable performance specifications of 40 CFR 60 and are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
    - The source complies with Condition D.1.7(b)

Compliance Monitoring Requirements

VENs

- Visible Emission Notations (VENs) of the stack exhausts of Boiler #1 (stack 001), Boiler #2 (stack 002), Boiler #3 (stack 003), and Boiler #4 (stack 004) were observed and found adequate. The VENs are recorded by trained employees.
    - The source complies with Conditions D.1.8 and D.1.10(e).

PERMIT SECTION D.1: Natural Gas Boilers

CEMS Equipment Downtime

- Veregy has a CEMS system in case of a breakdown and the source records the times, reasons, and efforts made to correct the reasons. The quarterly reports included *CEMS Emissions Summaries & Downtime Reports*.
    - The source complies with Condition D.1.9 and D.1.10(f).

Record-Keeping Requirements

Sulfur Dioxide Emissions and Sulfur Content
The quarterly reports included the Material Safety Data Sheet (MSDS).

Veregy maintained the following records monthly and were found adequate:

- Calendar dates covered in the compliance determination period.
- Actual Jet A, off-spec Jet A fuel, and No. 2 fuel oil usage since the last compliance determination period and equivalent sulfur dioxide emissions.
- To certify compliance when burning natural gas only, Veregy maintained records of natural gas burned.
    - The Natural Gas Records reviewed were from January 2024 to July 2024.

Veregy demonstrated compliance by showing fuel supplier certifications from *Marathon*, the certifications had the following:

- Fuel supplier certifications;
- The name of the fuel supplier
- A statement from the fuel supplier that certifies the sulfur content of the Jet A fuel, off-spec Jet A fuel, and No. 2 fuel oil
- A certified statement signed by the Permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

Veregy demonstrated fuel usage and fuel certification that were adequate. The source complies with Conditions D.1.10, D.1.2, and D.1.6

PSD Minor Limit (Sulfur Content)

- The source records and maintains records of the amount of each fuel combusted during each calendar month in Boiler #1, Boiler #2, Boiler #3, and Boiler #4.
    - The source complies with Conditions D.1.10(b) and D.1.1.

PSD Minor Limit (NOx and CO Emissions)

- The source records the output of the continuous monitoring systems and performs the required record-keeping and reporting, pursuant to 326 IAC 3-5-6 and 326 IAC 3-5-7.
    - The source complies with Condition D.1.10(c) and D.1.3(a).

- The source maintains monthly records of NOx and CO emissions from Boiler #1, Boiler #2, Boiler #3, and Boiler #4.
    - The source complies with Conditions D.1.10(d), D.1.3(a), and D.1.3(b).

PERMIT SECTION D.1: Natural Gas Boilers

Reporting Requirements

Veregy has been submitting its Quarterly Deviation and Monitoring Reports on time, in compliance with Conditions C.16, D.1.11, D.1.1, D.1.3(a) and D.1.3(b). There have been no late Quarterly Deviation and Monitoring Reports in the prior five (5) years.

Reporting Requirements for CEMS

- Veregy submits the reports of the results of the calibration gas audits and relative accuracy test audits for each calendar quarter within thirty (30) days after the end of each quarter with the information required by 326 IAC 3-5-5(e)(2). The sources uses RATA, CGA Calibration reports; and Daily Gas Audits & BDSCP Logs tracking.
    - The source complies with Condition D.1.12(a).

- Veregy submits reports for continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, and shall include the following:
    - Date of downtime
    - Time of commencement
    - Duration of each downtime
    - Reasons for each downtime
    - Nature of system repairs and adjustments
        - The source complies with Conditions D.1.12(b).

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: Parts Washer

Emission Units and Control Devices:

Insignificant Activities:

(a) Degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including the following:

(1) One (1) parts washer, with a maximum usage rate of 145 gallons per 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 8-3-2: Cold cleaner degreaser control equipment and operating requirements (VOC)
- 326 8-3-8: Material requirements for cold cleaner degreasers (VOC)

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

PERMIT SECTION D.2: Parts Washer		
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: Solvent purchase records, solvent SDS		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☒ No

Observations and Comments:

The parts washer and degreaser did not operate under observation during the inspection. The observed equipment appeared to be in good working order. Appropriate labeling, conspicuous signage regarding its use, and proper housekeeping procedures appeared to be in place. The source uses Green Unikleen as the solvent within the parts washer

Green Unikleen (SDS ID: 1223) is used in the parts washer and is compliant with applicable regulations. Solvent Purchase Records were reviewed and found to be adequate.

Mr. Powell stated that the source is considering removing the part washer and is thinking of removing it before the new permit is issued (#47917) and (#47924).

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: Grinding and Machining Operations; Un/paved Roads, Generators, and Fire Pumps

Emission Units and Control Devices:

Emissions Unit Description:

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day.

(c) Paved and unpaved roads and parking lots with public access.

(d) Emergency Generator #1, manufactured by Cummins, model number KTA39-G4, identified as emission unit 005, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 005, installed in 1993. [40 CFR 63, Subpart ZZZZ]

(e) Emergency Generator #2, manufactured by Cummins, model number KTA39-G4, identified as emission unit 006, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 006, installed in 1993.
[40 CFR 63, Subpart ZZZZ]

(f) Emergency Generator #3, manufactured by Cummins, model, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 007, installed in 1993. [40 CFR 63, Subpart ZZZZ]

(g) Fire Pump Engine #1, manufactured by Detroit Diesel, model number DDFP-L8FA- 8189F, identified as emission unit 008, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 008, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

(h) Fire Pump Engine #2, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 009, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 009, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

PERMIT SECTION D.3: Grinding and Machining Operations; Un/paved Roads, Generators, and Fire Pumps

(i) Fire Pump Engine #3, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 010, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 010, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

(j) Fire Pump Engine #4, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 011, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 011, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

(k) Fire Pump Engine # 5, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 012, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 012, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

Pollutants with Emission Limits or Applicable Standards:

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

Applicable Rules:

- 326 IAC 6.5-1-2(a): Particulate emission limitations; modification by commissioner (PM)

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: N/A		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☒ No

Observations and Comments:

Observation
The units of this permit section did not operate under observation during the inspection. The observed equipment appeared to be in good working order. No visible emissions were observed.

PMP

- A Preventative Maintenance Plan (PMP) for the facility and control equipment was reviewed and found to be adequate. The source uses an online application called *Infor* for keeping track of maintenance.
  - The source complies with Conditions D.1.5, D.3.2, and B.10.

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: Natural Gas Boilers

Emission Units and Control Devices:

Emissions Unit Description:

(a) Natural gas-fired Boiler #1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing Jet A fuel or No. 2 fuel oil during periods of gas curtailment, gas supply interruption, startups and periodic testing pursuant to 40 CFR 63.11237, Subpart JJJJJJ, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 001, installed in 1993. [40 CFR 60, Subpart Dc]

(b) Natural gas-fired Boiler #2, manufactured by Superior Boiler Works, Inc., identified as emission unit 002, with the capability of firing Jet A fuel or No. 2 fuel oil during periods of gas curtailment, gas supply interruption, startups and periodic testing pursuant to 40 CFR 63.11237, Subpart JJJJJJ, with a maximum heat input capacity of 25.2 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 002, constructed in 2016. [40 CFR 60, Subpart Dc]

Pollutants with Emission Limits or Applicable Standards:

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

Applicable Rule:

40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Applicability Information:

Under 40 CFR Part 60, Subpart Dc, this is an affected facility

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 Certifications		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☒ No

Observations and Comments:

See section D.1 for additional information.

Fuel Supplier Certification

Fuel supplier certification was demonstrated to show compliance and included a certified statement signed by the source. The signed statement also represented all of the fuel combusted during the reporting period.

- The source complies with Condition E.1.2(6) and 40 CFR 60.48c(e)(11)

Distillate Oil

The invoices for distillate oil were observed and found adequate. Veregy purchases its distillate oil from *Jackson Oil & Solvents Inc*. The invoices included the following:

- (i) The name of the oil supplier;
- (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in § 60.41c; and

PERMIT SECTION E.1: Natural Gas Boilers

- The sulfur content or maximum sulfur content of the oil."
  - The source complies with Condition E.1.2(6) and 40 CFR 60.48c(f)(1).

Semi-Annual Reporting

- "The reporting period for the reports required under this subpart is each six-(6) month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period."
  - The source complies with Condition E.1.2(6) and 40 CFR 60.48c(j).

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: Natural Gas Boilers

Emission Units and Control Devices:

Emissions Unit Description:

(c) Natural gas-fired Boiler #3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing Jet A fuel or No. 2 fuel oil only during periods of gas curtailment, gas supply interruption, startups and periodic testing pursuant to 40 CFR 63.11237, Subpart JJJJJJ, with a maximum heat input capacity of 122 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NOX control, with continuous emission monitoring systems (CEMS), exhausting to one stack, identified as stack 003, installed in 1994. [40 CFR 60, Subpart Db]

(d) Natural gas-fired Boiler #4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing Jet A fuel or No. 2 fuel oil only during periods of gas curtailment, gas supply interruption, startups and periodic testing pursuant to 40 CFR 63.11237, Subpart JJJJJJ, with a maximum heat input capacity of 122 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NOX control, with continuous emission monitoring systems (CEMS), exhausting to one stack, identified as stack 004, installed in 1994. [40 CFR 60, Subpart Db]

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 Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units CFR

Applicability Information:

Under 40 CFR 60 Subpart Db, this is an affected facility

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 usage records, CEMS records, Method 9 records		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☒ No

PERMIT SECTION E.2: Natural Gas Boilers

Observations and Comments:

See Section D.1 for additional information.

Records of Method 9 observations were reviewed and found to be adequate.

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: Emergency Generators

Emission Units and Control Devices:

Emissions Unit Description:

(d) Emergency Generator #1, manufactured by Cummins, model number KTA39-G4, identified as emission unit 005, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 005, installed in 1993.
[40 CFR 63, Subpart ZZZZ]

(e) Emergency Generator #2, manufactured by Cummins, model number KTA39-G4, identified as emission unit 006, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 006, installed in 1993.
[40 CFR 63, Subpart ZZZZ]

(f) Emergency Generator #3, manufactured by Cummins, model, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 007, installed in 1993. [40 CFR 63, Subpart ZZZZ]

(g) Fire Pump Engine #1, manufactured by Detroit Diesel, model number DDFP-L8FA- 8189F, identified as emission unit 008, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 008, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

(h) Fire Pump Engine #2, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 009, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 009, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

(i) Fire Pump Engine #3, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 010, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 010, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

(j) Fire Pump Engine #4, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 011, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 011, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

(k) Fire Pump Engine # 5, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 012, fired with Jet A fuel or No. 2 fuel oil, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 012, and installed in 1993. [40 CFR 63, Subpart ZZZZ]

Pollutants with Emission Limits or Applicable Standards:

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

PERMIT SECTION E.3: Emergency Generators

Applicable Rule:

40 CFR 63 Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Applicability Information:

Under 40 CFR 63 Subpart ZZZZ, this is an affected facility.

- Existing emergency, compression ignition units over 500 horsepower (emergency generators)
- Existing emergency, compression ignition units over 500 horsepower (fire pumps)

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: Operations and maintenance records		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☒ No

Observations and Comments:

See Section D.3 for additional information.

Observation
The units did not operate under observation during the inspection. The observed equipment appeared to be in good working order.

Fire Pump and Generators
The fire pumps and generators are equipped with non-resettable hour meters, which displayed the following values during the inspection:

*In the last inspection, Fire Pump 3 was noted to have 770.7 hours. Mr. Powell stated that the Fire Pump's hour meter was replaced.

Unit	Hour Reading
Fire Pump 1	959.7
Fire Pump 2	872.6
Fire Pump 3	12.8
Fire Pump 4	197.9
Fire Pump 5	771.9
Emergency Generator #1	1,334.3
Emergency Generator #2	1,335.5
Emergency Generator #3	1,320.7

Operation and Maintenance Records
Operation and maintenance records were spot-checked and found to be adequate. Records indicate the required services have been performed within the applicable deadlines.

Permit Section Compliance Status:

PERMIT SECTION E.3: Emergency Generators

☒ 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
If yes, the employees have been trained.	☐ Yes ☐ No ☒ N/A

Additional Information and Comments:

Annual Compliance Certifications
In the prior five (5) years, Veregy IN LLC submitted the 2023 ACCs late. The 2019, 2020, 2021, and 2022 ACCs were submitted on time.

Triennial Emission Statement
Veregy IN LLC has been submitting its Triennial Emission Statements on time, in compliance with Condition C.14. There have been no late ACCs in the prior five (5) years.

New Boiler Unit
Veregy is planning to construct and install a new 90 MMBtu/Hr Boiler 5 (EU 005), natural gas with No.2 fuel oil as backup. The boiler will be equipped with low NOx burners and flue gas recirculation. The boiler will continue to fire natural gas except during periods of natural gas curtailment in which the source will fire No.2 fuel oil.

Reconstructing Boilers
Veregy IN LLC submitted a permit modification and permit renewal (#47917) and (#47924). The source is planning the following:

- Reconstruction of Boiler 3 (EU 003)
- Reconstruction of Boiler 4 (EU 004)
    - The reconstruction will consist of replacing the burner, fuel train, forced draft fan, combustion, ductwork, and instrumentation and controls. After reconstruction, Boiler 3 and Boiler 4 will have the same burner size or smaller than the burners that are currently installed (122 MMBtu/Hr). Boiler 3 and Boiler 4 will be equipped with low NOx burners and flue gas recirculation, and the changes are not expected to increase the PTE for those two boilers. Additionally, the boilers will continue to fire natural gas except during periods of natural gas curtailment in which the source will fire No.2 fuel oil.

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 Matt Powell prior to exiting the facility.