Dear Matthew Baumgart and Bernand Paul,

I am the permit writer assigned to the current application No. 157-47776-00006 for Evonik Corporation Tippecanoe Laboratories, I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format).

I was informed that IDEM received the electronic (email) application of Johns Manville Inc, but not the hard copy. Please send us the application as soon as possible, without the hard copy we will not be able issue the permit. You can use the following postal address.

IDEM – Office of Air Quality – Permits Branch 100 N. Senate Avenue, MC 61-53 Room 1003 Indianapolis, IN 46204-2251 Telephone: (317) 233-0178 or Toll Free: 1-800-451-6027 x30178 (within Indiana) Facsimile Number: (317) 232-6749 <u>www.IN.gov/idem</u>

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If IU Health Saxony would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Ghassan Shalabi)

may be contacted at 317-232-4093 or <u>GHernand@idem.IN.gov</u>.

Thank you in advance for your time and assistance. I look forward to working with you.



Ghislaine Aponte Hernandez Environmental Manager OAQ Permits Branch Indiana Department of Environmental Management

317-232-4093 • ghernand@idem.IN.gov

From:	Baumgart, Matthew
То:	Aponte Hernandez, Ghislaine M; Bernie Paul
Subject:	RE: IDEM OAQ Contact Information for Application No. 157-47776-00006 for Evonik Corporation Tippecanoe Laboratories
Date:	Friday, May 3, 2024 11:35:18 AM
Attachments:	image001.png image004.png Railcar Platform Engine PTE.xlsx

Ghislaine,

Thank you for reaching out with your contact information. Attached is the Excel version of the calculations as you requested. The hard copy of the application should have been received by now, as it was mailed out by Certified Mail on Monday, 4/29/24.

Just to clarify, I noticed that you mentioned Johns Manville, Inc and IU Health Saxony in your original email. I assume this is just a copy and paste error and you already know that all of this should be for Evonik Corporation Tippecanoe Labs, but wanted to make sure.

Please let me know if you need anything else.

Vielen Dank - Thanks

Matt Baumgart ESH Engineer | Environmental, Safety, Health, Security (ESHS) | North America P +1 765 477-3570 | C +1 765 404-9524 | <u>Matthew.Baumgart@evonik.com</u>

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From: Aponte Hernandez, Ghislaine M <GHernand@idem.IN.gov>

Sent: Wednesday, May 1, 2024 8:09 AM

To: Baumgart, Matthew <matthew.baumgart@evonik.com>; Bernie Paul

<bernie@bpaulconsulting.com>

Subject: IDEM OAQ Contact Information for Application No. 157-47776-00006 for Evonik

Corporation Tippecanoe Laboratories

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Dear Matthew Baumgart and Bernand Paul,

I am the permit writer assigned to the current application No. 157-47776-00006 for Evonik Corporation Tippecanoe Laboratories, I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

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Thank you in advance for your time and assistance. I look forward to working with you.



Ghislaine Aponte Hernandez Environmental Manager OAQ Permits Branch Indiana Department of Environmental Management

317-232-4093 • ghernand@idem.IN.gov

Engine	Emission Factor Source	Capacity bhp-hr	Hrs of operation	NOx Emission Factor	Nox EF Units	NOx PTE [ton/yr]	SO2 Emission Factor	SO2 EF Units	SO2 PTE [ton/yr]	CO Emission Factor	CO EF Units	CO PTE [ton/yr]
Railroad Platform Diesel Generator	AP-42 Table 3.3-1	7	8760	0.031	lb NOx/bhp- hr	0.95	0.00205	lb SO2/bhp- hr	0.063	0.00668	lb CO/bhp- hr	0.20

From:	Baumgart, Matthew
То:	Aponte Hernandez, Ghislaine M
Cc:	Bernie Paul
Subject:	RE: IDEM OAQ Contact Information for Application No. 157-47776-00006 for Evonik Corporation Tippecanoe Laboratories
Date:	Thursday, June 6, 2024 5:08:30 PM
Attachments:	image003.png Generator emissions template.xlsx

Ghislaine,

The methodology used to determine the PTE emissions was to use the AP-42 factors published in Table 3.3-1 and the size of the generator engine to calculate the emissions, assuming it was operated continuously for the entire year. I have updated the PTE calculations to another template, which is attached, and I think explains things better than the original.

We prefer to permit the generator as a stationary source because it is currently unknown exactly how long it will stay in the same location and be operated, and we want the flexibility to leave it as long as it is needed for operations.

Vielen Dank - Thanks

Matt Baumgart

ESH Engineer | Environmental, Safety, Health, Security (ESHS) | North America P +1 765 477-3570 | C +1 765 404-9524 | <u>Matthew.Baumgart@evonik.com</u>

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From: Aponte Hernandez, Ghislaine M < GHernand@idem.IN.gov>

Sent: Wednesday, June 5, 2024 7:14 AM

To: Baumgart, Matthew <matthew.baumgart@evonik.com>

Cc: Bernie Paul <bernie@bpaulconsulting.com>

Subject: IDEM OAQ Contact Information for Application No. 157-47776-00006 for Evonik

Corporation Tippecanoe Laboratories

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Good morning,

Can you please include the mythology used for the non-emergency generator?, In addition, is this non-emergency generator is a portable unit?

Appendix A: Emission Calculations Reciprocating Internal Combustion Engines - Diesel Fuel Output Rating (<=600 HP)

 Company Name:
 Evonik Corporation, Tippecanoe Laboratories

 Source Address:
 Permit Number:

 Reviewer:
 Reviewer:

Output Horsepower Rating (hp)7.0Output Horsepower Rating (kw)5.2Maximum Hours Operated per Year8760Potential Throughput (hp-hr/yr)61,320Potential Throughput (kw-hr/yr)45,726

				Pollutant			
	PM	PM ₁₀	direct PM _{2.5}	SO2	NOx	VOC	CO
AP-42 Table 3.3-1 Emission Factor (lb/hp-hr)	0.0022	0.0022	0.0022	0.00205	0.0310	0.00251	0.00668
Potential to Emit (ton/year)	0.07	0.07	0.07	0.06	0.95	0.08	0.20

Hazardous Air Pollutants (HAPs)

		Pollutant							
								Total PAH	
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	HAPs**	
Emission Factor in lb/hp-hr***	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06	
Potential Emission in tons/yr	2.00E-04	8.78E-05	6.12E-05	8.39E-06	2.53E-04	1.65E-04	1.99E-05	3.61E-05	

**PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

***Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Combined HAPs (tons/yr) 8.31E-04

Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.3-1 and 3.3-2.

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] * [ton/2,000 lbs]

Potential Emission (tons/yr) = [Potential Throughput (kw-hr/yr)] * [Emission Factor (g/kw-hr)] * [lb / 453.592 g] * [ton/2,000 lbs]

From:	Aponte Hernandez, Ghislaine M
To:	<u>matthew.baumgart@evonik.com;</u> Bernie Paul
Cc:	<u>Wade, Taylor W</u>
Subject:	IDEM OAQ Contact Information for Application No. 157-47776-00006 for Evonik Corporation Tippecanoe Laboratories
Date:	Friday, June 7, 2024 2:26:00 PM
Attachments:	image004.png

Dear Matthew Baumgart and Bernand Paul,

I will be temporarily out of the office. For any permits related concerns please contact Taylor Wade, <u>TWade@idem.IN.govSection</u> or PR2 Section Chief, Ghassan Shalabi, <u>GShalabi@idem.IN.gov</u>. A new permit writer will contact you to assist you with issuance of the permit.



Ghislaine Aponte Hernandez Environmental Manager OAQ Permits Branch Indiana Department of Environmental Management

317-232-4093 • ghernand@idem.IN.gov

From:	Baumgart, Matthew
To:	Wade, Taylor W
Cc:	Bernie Paul
Subject:	RE: IDEM OAQ Contact Information for Application No. 157-47776-00006 for Evonik Corporation Tippecanoe Laboratories
Date:	Thursday, June 20, 2024 8:27:46 AM
Attachments:	image003.png

Taylor,

This is a new unit being integrated into the site this year.

Vielen Dank - Thanks

Matt Baumgart

ESH Engineer | Environmental, Safety, Health, Security (ESHS) | North America P +1 765 477-3570 | C +1 765 404-9524 | <u>Matthew.Baumgart@evonik.com</u>

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From: Wade, Taylor W <TWade@idem.IN.gov>

Sent: Wednesday, June 19, 2024 2:45 PM

To: Baumgart, Matthew <matthew.baumgart@evonik.com>

Cc: Bernie Paul <bernie@bpaulconsulting.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 157-47776-00006 for Evonik

Corporation Tippecanoe Laboratories

Importance: High

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Good Afternoon Mr. Baumgart,

Just a quick question: What was the construction year of the Railcar Platform generator? Or is it a new unit that has been integrated into the source this year?

From: Baumgart, Matthew <<u>matthew.baumgart@evonik.com</u>>

Sent: Thursday, June 6, 2024 5:07 PM

To: Aponte Hernandez, Ghislaine M <<u>GHernand@idem.IN.gov</u>>

Cc: Bernie Paul < bernie@bpaulconsulting.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 157-47776-00006 for Evonik Corporation Tippecanoe Laboratories

Ghislaine,

The methodology used to determine the PTE emissions was to use the AP-42 factors published in Table 3.3-1 and the size of the generator engine to calculate the emissions, assuming it was operated continuously for the entire year. I have updated the PTE calculations to another template, which is attached, and I think explains things better than the original.

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Vielen Dank - Thanks

Matt Baumgart

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From: Aponte Hernandez, Ghislaine M <<u>GHernand@idem.IN.gov</u>>

Sent: Wednesday, June 5, 2024 7:14 AM

To: Baumgart, Matthew <<u>matthew.baumgart@evonik.com</u>>

Cc: Bernie Paul < bernie@bpaulconsulting.com>

Subject: IDEM OAQ Contact Information for Application No. 157-47776-00006 for Evonik Corporation Tippecanoe Laboratories

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Good morning,

Can you please include the mythology used for the non-emergency generator?, In addition, is this non-emergency generator is a portable unit?

Thank you.

From:	Baumgart, Matthew
То:	Wade, Taylor W; Bernie Paul
Subject:	RE: Applicant Review for Title V Administrative Amendment No. 157-47776-00006 for Evonik Corporation
Date:	Tuesday, June 25, 2024 5:12:46 PM
Attachments:	image002.png

Taylor,

We have reviewed the attached documents and do not have any comments.

Vielen Dank - Thanks

Matt Baumgart

ESH Engineer | Environmental, Safety, Health, Security (ESHS) | North America P +1 765 477-3570 | C +1 765 404-9524 | <u>Matthew.Baumgart@evonik.com</u>

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From: Wade, Taylor W <TWade@idem.IN.gov>

Sent: Friday, June 21, 2024 11:14 AM

To: Baumgart, Matthew <matthew.baumgart@evonik.com>; Bernie Paul

Subject: Applicant Review for Title V Administrative Amendment No. 157-47776-00006 for Evonik Corporation

Importance: High

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Good Morning Mr. Baumgart and Mr. Paul:

Attached please find the draft Title V AA and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Title V AA permit No.: 157-47776-00006 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted **five (5) days** to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before **June 26, 2024**, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

The following documents are not including in this review but will be included in the final approval: Attachment B: 40 CFR Part 60, Subpart IIII Attachment C: 40 CFR Part 60, Subpart JJJJ Attachment F: 40 CFR Part 63, Subpart DDDDD Attachment G: 40 CFR Part 63, Subpart EEE Attachment H: 40 CFR Part 63, Subpart EEE Attachment N: 40 CFR Part 63, Subpart ZZZZ

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$1,586.00, which is based on the following:

\$0	TV Administrative Amendment
\$793	Each NSPS Review: \$793 (Subpart III)
\$793	Each NESHAP Review: \$793 (Subpart ZZZZ)

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,

Taylor Wade



Taylor Wade Environmental Engineer 1 Permits Branch/Office of Air Quality Indiana Department of Environmental Management (317) 233-0868 • twade@idem.IN.gov

IDEM values your feedback.



Please take two minutes and complete this brief survey.