

Mr. Ron Davies  
Ogden Martin Systems of Indianapolis, Inc.  
2320 South Harding Street  
Indianapolis, Indiana 46221

Re: **097-11772**  
First Administrative Amendment to  
**Part 70 Significant Source Modification**  
**097-10550-00123**

Dear Mr. Davies:

Ogden Martin Systems of Indianapolis applied for a Part 70 permit on May 31, 1996 for a municipal waste combustor facility. On October 13, 1999, a Significant Source Modification was issued to give the source approval to combust medical waste at the facility. A letter requesting an Administrative Amendment to the Significant Source Modification was received on January 14, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (Deleted language appears as ~~strikeouts~~ and the new language is **bolded**):

The source requests that the requirement to draft the Preventive Maintenance Plan (PMP) and Compliance Response Plan (CRP) correctly reflect the time frame in which the source will combust medical waste at the facility. The current requirement is within 90 days after permit issuance. Due to an appeal of the source's solid waste approval acceptance of medical waste at the facility has been delayed. Therefore, since the source has eighteen (18) months to construct its new equipment and accept medical waste, the source requests that the language in the conditions below be changed to accurately depict when the PMP and CRP shall be drafted.

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) ~~within ninety (90) days after issuance of this approval~~ **by the date the source first begins combustion of medical waste in any unit**, including the following information on each facility:

C.11 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data

Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared ~~within ninety (90) days after issuance of this approval~~ **by the date the source first begins combustion of medical waste in any unit** by the Permittee and maintained on site, and is comprised of :

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Autumn M. Marker, at (800) 451-6027, press 0 and ask for Autumn Marker or extension (3-0242), or dial (317) 233-0242.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

AMM

cc: File - Marion County  
U.S. EPA, Region V  
Marion County Health Department  
Indianapolis ERMD  
Air Compliance Section Inspector - Dick Sekula  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Rajesh Khanna - Ogden Energy Group, Inc.  
David Jordan - ERM  
Michele Herald - Ogden Martin Systems of Indianapolis, Inc.

# **PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Indianapolis Resource Recovery Facility  
Ogden Martin Systems of Indianapolis, Inc.  
2320 South Harding Street  
Indianapolis, Indiana 46221**

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

This approval 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 2-7 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.

Source Modification No.: 097-10550-00123	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 13, 1999
First Administrative Amendment No.: 097-11772	Affected Pages: 6 and 10
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

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- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this approval, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) by the date the source first begins combustion of medical waste in any unit, 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;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management

- (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared by the date the source first begins combustion of medical waste in any unit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall