INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: February 20, 2006

RE: Liberty Landfill, Inc. / 181-18254-00035

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

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(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 1/10/05

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Liberty Landfill, Inc.
8635 East State Road 16
Monticello, Indiana 47960

(herein known as the Permittee) is hereby authorized to 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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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.

Operation Permit No.: T181-18254-00035	
Issued by: Original signed by Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: February 20, 2006 Expiration Date: February 20, 2011

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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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary municipal solid waste landfill.

Responsible Official:	Director of Operations
Source Address:	8635 E. State Road 16, Monticello, IN 47960
Mailing Address:	8635 E. State Road 16, Monticello, IN 47960
SIC Code:	4953
County Location:	White
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This landfill site consists of a source with an on-site contractor:

(a) Liberty Landfill, Inc., the primary operation, owns and operates a municipal solid waste landfill, located at 8653 East State Road 16, Monticello, Indiana 47960 (SIC: 4953); and

(b) Liquid Solutions, LLC., an on-site contractor, purchases and utilizes the landfill gas generated from Liberty Landfill, Inc. in the enclosed flare/leachate evaporator system.

IDEM has determined that Liberty Landfill, Inc. and Liquid Solutions, LLC. are considered one source due to contractual control. Therefore, the term “source” in the Part 70 documents refers to both Liberty Landfill, Inc. and Liquid Solutions, LLC.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) solid waste disposal facility, as defined in 40 CFR 60.751, constructed in 1982, modified in 1993, with a maximum design capacity of 11,086,700 cubic meters (11,635,115 megagrams).

(b) One (1) gas collection system (GCS) designed and having a capacity in accordance with the applicable provisions of 40 CFR 60, Subpart WWW.

(c) One (1) enclosed ground flare, identified as FL4, installed in 2005, with a combustion capacity of 1,000 cubic feet per minute of landfill gas (LFG) per hour. This flare does not have a bypass.

(d) One (1) Leachate Evaporation System identified as E-Vap, installed in 1998 and modified in 2005, with a maximum evaporation rate of 12,000 gallons per day, controlled by an integral enclosed flare FL4. The evaporator has a maximum heat input rate of 6.6 MMBtu/hr, using landfill gas as fuel. This system is used to process the leachate

generated from this landfill and dilute industrial wastewater received from other plants.

(e) Four (4) 1,148 horsepower (8.9 MMBtu/hr) engines, identified as EG1 through EG4, constructed in 2005, using treated landfill gas as a fuel, each with a landfill gas input rate of 307 scfm of landfill gas, and exhausting through stacks ES1 through ES4, respectively. Each engine is equipped with a crankcase for engine oil, which consumes a maximum of 20 gallons of engine oil per month and exhausts through a crankcase breather vent. (The crankcase breather vent is an insignificant activity.)

(f) One (1) open flare, identified as FL2, constructed in 2005, with a maximum heat input capacity of 37.1 MMBtu per hour and a maximum flow rate of 1,362 scfm of landfill gas, and exhausting through stack FS2. This flare does not have a bypass.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) parts washing station, constructed in 2004, with a maximum capacity of 20 gallons. [326 IAC 8-3-2] [326 IAC 8-3-5]

(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T181-18254-00035, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 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.4 Enforceability [326 IAC 2-7-7]

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.5 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification 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, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(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 2-7-5(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 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]

(a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

(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.

(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 or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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.11 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, 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 Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(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 Branch, Office of Air Quality
100 North Senate Avenue
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 2-7-5(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-4(c)(9) 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 2-7 and any other applicable rules.

(g) 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.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a

determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T181-18254-00035 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-9(a)(3)]

(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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(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 2-7-4. 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(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 2-7 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 in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the

request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in 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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) 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 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within 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) Except as provided in 326 IAC 2-7-19(e), 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 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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:

(a) Opacity shall not exceed an average of forty percent (40%) 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. This condition is not federally enforceable.

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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, 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.8 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance (except as otherwise provided for in 40 CFR 60, Subpart WWW. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 Branch, Office of Air Quality
100 North Senate Avenue
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 the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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.

(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 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on October 22, 1999.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned 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 within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(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;

(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 maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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 the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(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. 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 make 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.19 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 the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) solid waste disposal facility, as defined in 40 CFR 60.751, constructed in 1982, modified in 1993, with a maximum design capacity of 11,086,700 cubic meters (11,635,115 megagrams).

(b) One (1) gas collection system (GCS) designed and having a capacity in accordance with the applicable provisions of 40 CFR 60, Subpart WWW.

(c) One (1) enclosed ground flare, identified as FL4, installed in 2005, with a combustion capacity of 1,000 cubic feet per minute of landfill gas (LFG) per hour. This flare does not have a bypass.

(d) One (1) Leachate Evaporation System identified as E-Vap, installed in 1998 and modified in 2005, with a maximum evaporation rate of 12,000 gallons per day, controlled by an integral enclosed flare FL4. The evaporator has a maximum heat input rate of 6.6 MMBtu/hr, using landfill gas as fuel. This system is used to process the leachate generated from this landfill and dilute industrial wastewater received from other plants.

(f) One (1) open flare, identified as FL2, constructed in 2005, with a maximum heat input capacity of 37.1 MMBtu per hour and a maximum flow rate of 1,362 scfm of landfill gas, and exhausting through stack FS2. This flare does not have a bypass.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to NSPS and NESHAP [326 IAC 12-1-1] [40 CFR Part 60, Subpart A]

(a) The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart WWW, or as specified by approved variances contained within the Collection and Control Design Plan.

(b) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart AAAA.

(c) The provisions of 40 CFR Part 61, Subpart A - General Provisions, which are incorporated as 326 IAC 14-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 61, Subpart M.

(d) Pursuant to a letter from EPA Region V (dated March 4, 2004), the proposed gas recovery plant at Liberty Landfill, Inc. is considered a treatment system. The engines, which combust the treated landfill gas, are not subject to the testing requirements in 40 CFR 60.754, the monitoring requirements in 40 CFR 60.756, the record keeping requirements in 40 CFR 60.758, the testing and monitoring requirements in 40 CFR 63.1960, and the recordkeeping and reporting requirements in 40 CFR 63.1980. The existing four (4) landfill gas fueled engine/generators (EG1 through EG4) have no applicable requirements under the New Source Performance Standard for Municipal Solid Waste Landfills, 40 CFR Part 60, Subpart WWW, and the National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills, 40 CFR 63, Subpart AAAA.

(e) The existing four (4) landfill gas fueled engine/generators (EG1 through EG4) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ.

D.1.2 Operational Standards for Collection and Control Systems [40 CFR 60.753] [326 IAC 8-8.1] [326 IAC 12]

In order to comply with 40 CFR 60.752 (b)(2)(ii), the Permittee shall:

(a) Operate the collection system such that gas is collected from each area, cell, or group of cells in the municipal solid waste landfill in which solid waste has been in place for five years if active or 2 years or more if closed or at final grade.

(b) Operate the collection system with negative pressure at each wellhead except under the following conditions:

(1) Fire or increased well temperature. The Permittee shall record instances when positive pressure occurs in efforts to avoid a fire. These records shall be submitted with the annual reports as provided in 40 CFR 60.757(f)(1).

(2) Use of a geomembrane or synthetic cover. The Permittee shall not exceed a maximum positive pressure limit of 5.0 inches water column.

(3) A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the Office of Air Quality (OAQ).

(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than the following and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent.

(1) Less than 138EF(59 ^{o}C) for well #50;

(2) Less than 135EF(57 ^{o}C) for well #51; and

(3) Less than 140EF(60 ^{o}C) for well #48; and

(4) Less than 131EF (55EC) for all other wells.

The Permittee may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. The Permittee has shown supporting data that the above elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

(1) The nitrogen level shall be determined using Method 3C, unless an alternative method is established as allowed by 40 CFR 60.752(b)(2)(i).

(2) Unless an alternative test method is established as allowed by 40 CFR 60.752 (b)(2)(i), the oxygen shall be determined by an oxygen meter using Method 3A or 3C except that; the span shall be set so that the regulatory limit is between 20 and 50 percent of the span; a data recorder is not required; only two calibration gases are required, a zero and span, and ambient air may be used as the span; a calibration error check is not required; the allowable sample bias, zero drift, and calibration drift are ±10 percent.

(d) Operate the collection system so that the methane concentration is less than 500 parts

per million above background at the surface of the landfill. To determine if this level is exceeded, the Permittee shall conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The Permittee may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan shall be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30 meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.

(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 40 CFR 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within one hour.

(f) Operate the control system at all times when the collected gas is routed to the system.

(g) If monitoring demonstrates that the operational requirements in 40 CFR 60.753(b), (c), or (d) are not met, corrective action shall be taken as specified in 40 CFR 60.755(a)(3) through (5) or 40 CFR 60.755(c). If corrective actions are taken as specified in 40 CFR 60.755, the monitored exceedance is not a violation of the operational requirements in 40 CFR 60.753.

D.1.3 Monitoring [40 CFR 60.756] [326 IAC 8-8.1] [326 IAC 12]

Except as provided in 40 CFR 60.752(b)(2)(i)(B),

(a) The Permittee uses an active gas collection system to comply with 40 CFR 60.752(b)(2)(ii)(A), and therefore shall install a sampling port and a thermometer, other temperature measuring device or an access port for temperature measurements at each wellhead and:

(1) Measure the gauge pressure in the gas collection header on a monthly basis as provided in 40 CFR 60.755(a)(3);

(2) Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis as provided in 40 CFR 60.755(a)(5); and

(3) Monitor temperature of the landfill gas on a monthly basis as provided in 40 CFR 60.755(a)(5).

(b) The Permittee uses an enclosed combustor to comply with 40 CFR 60.752(b)(2)(iii), and therefore shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment:

(1) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ±1 percent of the temperature being measured expressed in degrees Celsius of ±0.5 EC, whichever is greater. A temperature monitoring device is not required for boilers or process heaters with design heat input capacity greater than 44 megawatts.

(2) A device that records flow to the control device.

(c) The Permittee uses an open flare to comply 40 CFR 60.752(b)(2)(iii), and therefore shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:

(1) Heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame

(2) A device that records flow to the flare. The Permittee shall install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every fifteen minutes.

(d) To demonstrate compliance with 40 CFR 60.755(c), the Permittee shall monitor surface concentrations of methane according to the instrument specifications and procedures provided in 40 CFR 60.755(d). Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring.

D.1.4 Municipal Solid Waste Landfill NESHAP [40 CFR 63, Subpart AAAA]

Pursuant to 40 CFR 63.1955, the Permittee shall:

(a) Comply with the requirements of 40 CFR 60, Subpart WWW.

(b) The Permittee shall comply with the general and continuing compliance requirements for the collection and control system as specified in 40 CFR 63.1960 through 40 CFR 63.1985.

(c) For approval of collection and control systems that include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions, the Permittee must follow the procedures in 40 CFR 60.752(b)(2). If alternatives have already been approved under 40 CFR 60, Subpart WWW, these alternatives can be used to comply with 40 CFR 63, Subpart AAAA, except that all affected sources must comply with the Startup, Shutdown, and Malfunction (SSM) requirements in Subpart A of 40 CFR 63 as specified in Table 1 of 40 CFR 63, Subpart AAAA and all affected sources must submit compliance reports every six (6) months as specified in 40 CFR 63.1980(a) and (b), including information on all deviations that occurred during the six (6)-month reporting period. Deviations (as defined in 40 CFR 63.1965) for continuous emission monitors or numerical continuous parameter monitors must be determined using a three (3) hour monitoring block average (as defined in 40 CFR 63.1975).

D.1.5 NESHAP for Active Asbestos Waste Disposal Sites [40 CFR 61.154, Subpart M] [326 IAC 14]

Pursuant to the National Emissions Standards for Hazardous Air Pollutants 326 IAC 14-2-1, (40 CFR 61.154, Subpart M), any active waste disposal site that receives asbestos-containing waste material must either:

(a) Allow no visible emissions to the outside air from any active waste disposal site where asbestos-containing waste material has been deposited, or comply with 40 CFR 61.154 (b) or 40 CFR 61.154 (c).

(b) At least once every 24-hour period, asbestos-containing waste material that has been deposited during the previous 24-hour period must:

(1) Be covered with at least 15 centimeters (6 inches) of compacted nonasbestos containing material, or

(2) Be covered with a resinous or petroleum-based dust suppression agent that effectively binds dust and controls wind erosion. Such an agent shall be used in

the manner and frequency recommended for the particular dust by the dust suppression agent manufacturer to achieve and maintain dust control. Other equally effective dust suppression agents may be used upon prior approval by the Administrator. Any used, spent, or other waste oil is not considered a dust suppression agent.

(c) Use an alternate emissions control method that has received prior written approval by the Administrator according to the procedures described in 40 CFR 61.149(c)(2).

(d) Also, unless a natural barrier deters access by the general public, warning signs and fencing must be installed or the requirements of paragraph (b)(1) above must be met. The perimeter of the disposal site must be fenced in a manner adequate to deter access by the general public. The warning signs must:

(1) Be posted in such a manner and location that a person can easily read the legend; and

(2) Conform to the requirements of 51 cm x 36 cm upright format signs specified in 29 CFR 1910.145(d)(4) and this paragraph; and

(3) Display the information contained in the legend provided in 40 CFR 61.154(b)(1)(iii).

Compliance Determination Requirements

D.1.6 Compliance Provisions [40 CFR 60.755] [326 IAC 8-8.1] [326 IAC 12]

(a) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the specified methods below shall be used to determine whether the gas collection system is in compliance with 40 CFR 60.752(b)(2)(ii).

(1) For the purpose of calculating the maximum expected gas generation flow rate from the landfill to determine compliance with 60.752(b)(2)(ii)(A)(1), one of the following equations shall be used. The k and L_o kinetic factors should be those published in the most recent Compilation of Air Pollution Emission Factors (AP-42) or other site-specific values demonstrated to be appropriate and approved by the Office of Air Quality (OAQ). If k has been determine as specified in 40 CFR 60.754(a)(4), the value of k determined from the test specified under 40 CFR 60.754(a)(4) shall be used. A value of no more than 15 years shall be used for the intended use period of the gas mover equipment. The active life of the landfill is the age of the landfill plus the estimated number of years until closure.

For sites with unknown year-to-year solid waste acceptance rate:

$$Q_m = 2L_o R (e^{-kc} - e^{-kt})$$

where,

Q_m = maximum expected gas generation flow rate, cubic meters per year
L_o = methane generation potential, cubic meters per megagram solid waste
R = average annual acceptance rate, megagrams per year
k = methane generation rate constant, $year^{-1}$
t = age of the landfill at equipment installation plus the time the owner or operator intends to use the gas mover equipment or active life of the landfill, whichever is less. If the equipment is installed after closure, t is the age of the landfill at installation, years.
c = time since closure, years (for an active landfill c = 0 and $e^{-kc} = 1$)

For sites with known year-to-year solid waste acceptance rate:

$$Q_M = \sum_{i=1}^{n} 2\, k\, L_O\, M_i\, (e^{-kt_i})$$

where,
Q_M = maximum expected gas generation flow rate, cubic meters per year
k = methane generation rate constant, year $^{-1}$
L_o = methane generation potential, cubic meters per megagram solid waste
M_i = mass of solid waste in the ith section, megagrams
t_i = age of the ith section, years

If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, the equations in 40 CFR 60.755(a)(1)(i) and (ii). If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using the equations in 40 CFR 60.755(a)(1)(i) or (ii) or other methods shall be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment.

(2) For the purposes of determining sufficient density of gas collector for compliance with 40 CFR 60.752 (b)(2)(ii)(A)(2), the Permittee shall design a system of vertical wells, horizontal collectors, or other collection devices, satisfactory to the Office of Air Quality (OAQ), capable of controlling and extracting gas from all portions of the landfill sufficient to meet all operational and performance standards.

(3) For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with 40 CFR 60.752(b)(2)(ii)(A)(3), the Permittee shall measure gauge pressure in the gas collection header at each individual well, monthly. If a positive pressure exists, action shall be initiated to correct the exceedance within five (5) calendar days, except for the three conditions allowed under 40 CFR 60.753(b). If negative pressure cannot be achieved without excess air infiltration within fifteen (15) calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.

(4) The Permittee is not required to expand the system as required in 40 CFR 60.755(a)(3) during the first 180 days after gas collection system start-up.

(5) For the purpose of identifying whether excess air infiltration into the landfill is occurring, the Permittee shall monitor each well monthly for temperature and nitrogen or oxygen as provided in 40 CFR 60.753(c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within five (5) calendar days. If correction of the exceedance cannot be achieved within fifteen (15) calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.

(6) If the Permittee seeks to demonstrate compliance with 40 CFR 60.752(b)(2)(ii)(A)(4) through the use of a collection system not conforming to the specifications provided in 40 CFR 60.759, then the Permittee shall provide

information satisfactory to the Office of Air Quality (OAQ) as specified in 40 CFR 60.752 (b)(2)(i)(C) demonstrating that off-site migration is being controlled.

(b) For purposes of compliance with 40 CFR 60.753(a), the Permittee shall place each well or design component of a controlled landfill as specified in the approved design plan as provided in 40 CFR 60.752(b)(2)(i). Each well shall be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of five (5) years or more if active or two (2) years or more if closed or at final grade.

(c) The following procedures shall be used for compliance with the surface methane operational standard as provided in 40 CFR 60.753 (d):

(1) After installation of the collection system, the Permittee shall monitor surface concentrations of methane along the entire perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals (or a site-specific established spacing) for each collection area on a quarterly basis using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in 40 CFR 60.755(d).

(2) The background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from perimeter wells.

(3) Surface emission monitoring shall be performed in accordance with section 4.3.1 of Method 21 of Appendix A of 40 CFR60, except that the probe inlet shall be placed within five (5) to ten(10) centimeters of the ground. Monitoring shall be performed during typical meteorological conditions.

(4) Any reading of 500 parts per million or more above background at any location shall be recorded as a monitored exceedance and the actions specified in 40 CFR 60.755(c)(4)(i) through (v) should be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements of 40 CFR 60.753(d).

The location of each monitored exceedance shall be marked and the location recorded.

Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be re-monitored with ten (10) calendar days of detecting the exceedance.

If the re-monitoring of the location shows a second exceedance, additional corrective action shall be taken and the location shall be monitored again within ten (10) days of the second exceedance. If re-monitoring shows a third exceedance for the same location, the action specified in paragraph 40 CFR 60.755(c)(4)(v) shall be taken, and no further monitoring of that location is required until the action specified in 40 CFR 60.755(c)(4)(v) has been taken.

Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day re-monitoring specified in 40 CFR 60.755(c)(4)(ii) or (iii) shall be re-monitored one (1) month from the initial exceedance. If the one (1)-month re-monitoring shows a concentration less than 500 parts per million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the one (1)-month remonitoring shows an exceedance, the actions specified in 40

CFR 60.755(c)(4)(iii) or (v) shall be taken.

For any location where monitored methane concentration equals or exceeds 500 parts per million above background three times within a quarterly period, a new well or other collection device shall be installed within 120 calendar of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted to the Office of Air Quality (OAQ) for approval.

(5) The Permittee shall implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.

(d) The Permittee seeking to comply with the provisions of 40 CFR 60.755(c) shall comply with the following instrumentation specifications and procedures for surface emission monitoring devices:

(1) The portable analyzer shall meet the instrument specifications provided in section 3 of Method 21 of Appendix A of 40 CFR 60, except that “methane” shall replace all references to volatile organic compound (VOC).

(2) The calibration gas shall be methane, diluted to a nominal concentration of 500 parts per million in air.

(3) To meet the performance evaluation requirements in section 3.1.3 of Method 21 of appendix A of 40 CFR 60, the instrument evaluation procedures of section 4.4 of Method 21 of Appendix A of 40 CFR 60 shall be used.

(4) The calibration procedures provided in section 4.2 of Method 21 of Appendix A of 40 CFR 60 shall be followed immediately before commencing a surface monitoring survey.

(e) The provisions of 40 CFR 60.755 shall apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction, shall not exceed five (5) days for collection systems and shall not exceed one (1) hour for treatment or control devices.

D.1.7 Testing Requirements [326 IAC 2-7-6(1)(6)] [40 CFR 60.754(b)] [326 IAC 8-8.1] [326 IAC 12]

(a) After installation of a collection and control system in compliance with 40 CFR 60.755, the Permittee shall calculate the non methane organic compound (NMOC) emission rate for purposes of determining when the system can be removed using the following equation:

$$M_{NMOC} = 1.89 \times 10^{-3} Q_{LFG} C_{NMOC}$$

where,

M_{NMOC} = mass emission rate of NMOC, megagrams per year
Q_{LFG} = flow rate of landfill gas, cubic meters per minute
C_{NMOC} = NMOC concentration, parts per million by volume as hexane

(1) The flow rate of landfill gas, Q_{LFG}, shall be determined by measuring the total landfill gas flow rate at the common header pipe that leads to the control device using a gas flow measuring device calibrated according to the provisions of section 4 of Method 2E of Appendix A of 40 CFR 60.

(2) The average NMOC concentration, C_{NMOC}, shall be determined by collecting and analyzing landfill gas sampled from the common header pipe before the gas

moving or condensate removal equipment using the procedures in Method 25C or Method 18 of Appendix A of 40 CFR 60. If using Method 18 of Appendix A of 40 CFR 60, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The sample location on the common header pipe shall be before any condensate removal or other gas refining units. The Permittee shall divide the NMOC concentration from Method 25C of Appendix A of 40 CFR 60 by six to convert from C_{NMOC} as carbon to C_{NMOC} as hexane.

(3) The Permittee may use another method to determine landfill gas flow rate and NMOC concentration if the method has been approved by the Office of Air Quality (OAQ).

(b) Pursuant to 40 CFR 60.754(d):

For the performance testing required in 40 CFR 60.752(b)(2)(iii)(B), Method 25 or Method 18 of Appendix A of 40 CFR 60 shall be used to determine compliance with the 98 weight percent efficiency or the 20 ppmv outlet concentration level, unless another method to demonstrate compliance has been approved by the Office of Air Quality (OAQ) as provided by 40 CFR 60.752(b)(2)(i)(B). If using Method 18 of appendix A, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The following equation shall be used to calculate efficiency:

Control Efficiency = $(NMOC_{in} - NMOC_{out}) / (NMOC_{in})$

where,

$NMOC_{in}$ = mass of NMOC entering the control device
$NMOC_{out}$ = mass of NMOC exiting control device

D.1.8 Calculation of Non-Methane Organic Compound (NMOC) Rate [40 CFR 60.754] [326 IAC 8-8.1] [326 IAC 12]

Pursuant to 40 CFR 60.754, the Permittee shall, when calculating emissions for PSD purposes, estimate the NMOC emission rate for comparison to the PSD major source and significance levels in 40 CFR 51.166 or 40 CFR 52.21 using AP-42 or other approved measurement procedures. If a collection system, which complies with the provisions of 40 CFR 60.752(b)(2) is already installed, the Permittee shall estimate the NMOC emission rate using the procedures provided in 40 CFR 60.754(b).

D.1.9 Compliance Determination [40 CFR 63.1960]

Pursuant to 40 CFR 63.1960, compliance with 40 CFR 63, Subpart AAAA is determined by the following:

(a) The same way it is determined for 40 CFR 60, Subpart WWW, including performance testing, monitoring of the collection system, continuous parameter monitoring, and other credible evidence.

(b) Continuous parameter monitoring data, collected under 40 CFR 60.756(b)(1), (c)(1), and (d) of Subpart WWW, are used to demonstrate compliance with the operating conditions for control systems. If a deviation (as defined in 40 CFR 63.1965) occurs, the Permittee has failed to meet the control device operating conditions described in 40 CFR 60, Subpart WWW and has deviated from the requirements of 40 CFR 63, Subpart AAAA.

(c) The Permittee must develop and implement a written Startup, Shutdown, and Malfunction (SSM) plan according to the provisions in 40 CFR 63.6(e)(3). A copy of the SSM plan

must be maintained on site. Failure to write, implement, or maintain a copy of the SSM plan is a deviation from the requirements of 40 CFR 63, Subpart AAAA.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements [326 IAC 12] [40 CFR 60.758] [326 IAC 8-8.1] [326 IAC 2-7-10.5][326 IAC 8-1-6]

(a) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee subject to 40 CFR 60.752(b) shall keep for at least five years up-to-date, readily accessible, continuous on-site records of the design capacity report which triggered 40 CFR 60.752(b), the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within four (4) hours. Either paper copy or electronic formats are acceptable.

(b) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee of a controlled landfill shall keep up-to-date, readily accessible records for the life of the control equipment listed in (1) through (2) below as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring shall be maintained for a minimum of five (5) years. Records of control device vendor specifications shall be maintained until removal.

(1) The Permittee demonstrating compliance with 40 CFR 60.752(b)(2)(ii) shall record:

(A) The maximum expected gas generation flow rate as calculated in 40 CFR 60.755(a)(1). The Permittee may use another method to determine the maximum gas generation flow rate, if the method has been approved by the Office of Air Quality (OAQ).

(B) The density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 CFR 60.759(a)(1).

(2) The Permittee demonstrating compliance with 40 CFR 60.752(b)(2)(iii)(A) through use of an open flare shall record:

(A) The flare type (i.e., steam-assisted, air-assisted, or nonassisted), all visible emission readings, heat content determination, flow rate measurements, and exit velocity determinations made during the performance test as specified in 40 CFR 60.18.

(B) Continuous records of the flare pilot flame or flare flame monitoring and records of all periods of operations during which the pilot flame of the flare flame is absent.

(c) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee shall keep for five years up-to-date, readily accessible, continuous on-site records of the equipment operating parameters specified to be monitored in 40 CFR 60.756 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.

(1) The Permittee subject to 40 CFR 60.758 shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device specified under 40 CFR 60.756.

(2) The Permittee complying with the provisions of 40 CFR 60.758 by use of an open

flare, shall keep up-to-date, readily accessible continuous records of the flame or flare pilot flame monitoring specified under 40 CFR 60.756(c), and up-to-date, readily accessible records of all periods of operation in which the flame or flare pilot flame is absent.

(d) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee shall keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector.

(1) The Permittee subject to the provisions of 40 CFR 60.758 shall keep up-to-date, readily accessible records of the installation date and location of all newly installed collectors as specified in 40 CFR 60.755 (b).

(2) The Permittee subject to the provisions of 40 CFR 60.758 shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as provided in 40 CFR 60.759 (a)(3)(i) as well as any non-productive areas excluded from collection as provided in 40 CFR 60.759 (a)(3)(ii).

(e) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee shall keep for at least five (5) years up-to-date, readily accessible records of all collection and control system exceedances of the operational standards in 40 CFR 60.753, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements [40 CFR 60.757] [326 IAC 8-8.1]

Pursuant to 40 CFR 60.757, except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee shall:

(a) Submit a closure report to the IDEM, OAQ within thirty (30) days of waste acceptance cessation. The IDEM, OAQ may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR 258.60. If a closure report has been submitted to the IDEM, OAQ, no additional wastes may be placed into the landfill without filing a notification of modification as described under 40 CFR 60.7(a)(4).

(b) Submit an equipment removal report to the IDEM, OAQ thirty (30) days prior to removal or cessation of operation of the control equipment. The equipment removal report shall contain all of the following items: a copy of the closure report submitted in accordance with 40 CFR 60.757(d), a copy of the initial performance test report demonstrating that the fifteen (15) year minimum control period has expired, and dated copies of three (3) successive NMOC emission rate reports demonstrating that the landfill is no longer producing 50 megagrams or greater of NMOC per year. The fifteen year control period begins upon initial operation of the gas collection and control system. The IDEM, OAQ may request such additional information as may be necessary to verify that all of the conditions for removal in 40 CFR 60.752(b)(2)(v) have been met.

(c) Submit annual reports of the following recorded information. For enclosed combustion devices and flares, reportable exceedances are defined under 40 CFR 60.758(c).

(1) Value and length of time for exceedance of applicable parameters monitored under 40 CFR 60.756(a), (b), (c), and (d).

(2) Description and duration of all periods when the control device was not operating for a period exceeding one (1) hour and length of time the control device was not operating.

(3) All periods when the collection system was not operating in excess of five (5) days.

(4) Location of each exceedance of the 500 parts per million methane concentration as provided in 40 CFR 60.753(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month.

(5) Date of installation and the location of each well or collection system expansion added pursuant to 40 CFR 60.755(a)(3), (b), and (c)(4).

Pursuant to 40 CFR 63.1980, the Permittee is required to submit the above report on a semi-annual basis, as specified in Condition D.1.12(a).

(d) The Permittee complying with 40 CFR 40.752(b)(2)(iii) shall include the following information with the initial performance test report required under 40 CFR 60.8:

(1) A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for the future collection system expansion.

(2) The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based.

(3) The documentation of the presence of asbestos or nondegradable material for each area from which collection wells have been excluded based on the presence of asbestos or nondegradable material.

(4) The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on nonproductivity and the calculations of gas generation flow rate for each excluded area.

(5) The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill

(6) The provisions for the control of off-site migration.

(e) A summary of the above information shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit.

D.1.12 Record Keeping and Reporting Requirements for NESHAP for Municipal Solid Waste Landfills [40 CFR 63.1980]

Pursuant to 40 CFR 63.1980, the Permittee shall:

(a) Keep records and reports as specified in 40 CFR 60, Subpart WWW, with one exception: The Permittee must submit the annual report described in 40 CFR 60.757(f) and Condition D.1.12(c) every six (6) months. Fulfilling this requirement fulfills the annual reporting requirement for 40 CFR 60.757(f) in Condition D.1.12(c).

(b) Keep records and reports as specified in the general provisions of 40 CFR 60 and 40 CFR 63 as shown in Table 1 of 40 CFR 63, Subpart AAAA. Applicable records in the general provisions include items such as SSM plans and the SSM plan reports. The SSM Plan report is due semi-annually.

D.1.13 Record keeping and Reporting Requirements for NESHAP for Active Asbestos Waste Disposal Sites [40 CFR 61.154] [326 IAC 14]

Pursuant to 40 CFR 61, Subpart M, the Permittee shall:

(a) For all asbestos containing waste material received, the Permittee of the active waste disposal site shall:

(1) Maintain waste shipment records and include the following information:

(A) The name, address, and telephone number of the waste generator;

(B) The name, address, and telephone number of the transporter(s);

(C) The quantity of the asbestos containing waste material in cubic meters (cubic yards).

(D) The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers. Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and if different, the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the disposal site, by the following working day, the presence of a significant amount of improperly enclosed or uncovered waste. Submit a copy of the waste shipment record along with the report.

(E) The date of the receipt.

(2) As soon as possible and no longer than 30 days after receipt of the waste, send a copy of the signed waste shipment record to the waste generator.

(3) Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity actually received, attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and if different, the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the disposal site. Describe the discrepancy and attempts to reconcile it, and submit a copy of the waste shipment record along with the report.

(4) Retain a copy of all records and reports required by this paragraph for at least 2 years.

(b) Maintain until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area.

(c) Upon closure, comply with all the provisions of 40 CFR 61.151.

(d) Submit to the Administrator, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities.

(e) Furnish upon request, and make available during normal business hours for inspection by the Administrator, all records required under this section.

(f) Notify the Administrator in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the Administrator at least ten (10) working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. Include the following information in the notice:

(1) Scheduled starting and completion dates.

(2) Reason for disturbing the waste.

(3) Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the Administrator may require changes in the emission control procedures to be used.

(4) Location of any temporary storage site and the final disposal site.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) Four (4) 1,148 horsepower (8.9 MMBtu/hr) engines, identified as EG1 through EG4, constructed in 2005, using treated landfill gas as a fuel, each with a landfill gas input rate of 307 scfm, and exhausting through stacks ES1 through ES4, respectively. Each engine is equipped with a crankcase for engine oil, which consumes a maximum of 20 gallons of engine oil per month and exhausts through a crankcase breather vent. (The crankcase breather vent is an insignificant activity.)

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

There are no applicable state or federal requirements for these emission units.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) parts washing station, constructed in 2004, with a maximum capacity of 20 gallons. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operation requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{o}C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Liberty Landfill, Inc.
Source Address: 8635 East State Road 16, Monticello, Indiana 47960
Mailing Address: 124 Twin Bridges Road, Danville, Indiana 46122
Part 70 Permit No.: T181-18254-00035

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:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name:	Liberty Landfill, Inc.
Source Address:	8635 East State Road 16, Monticello, Indiana 47960
Mailing Address:	124 Twin Bridges Road, Danville, Indiana 46122
Part 70 Permit No.:	T181-18254-00035

This form consists of 2 pages **Page 1 of 2**

☐ 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**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
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:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Liberty Landfill, Inc.
Source Address: 8635 East State Road 16, Monticello, Indiana 47960
Mailing Address: 124 Twin Bridges Road, Danville, Indiana 46122
Part 70 Permit No.: T181-18254-00035

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, 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".	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Liberty Landfill, Inc.
Source Location:	8635 East State Road 16, Monticello, Indiana 47960
County:	White
SIC Code:	4953
Operation Permit No.:	T181-18254-00035
Permit Reviewer:	ERG/ST

On November 1, 2005, the Office of Air Quality (OAQ) had a notice published in the Herald Journal, Monticello, Indiana, stating that Liberty Landfill, Inc. had applied for a Part 70 Operating Permit Renewal to continue to operate a municipal solid waste landfill with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 11, 2005, Liberty Landfill, Inc. submitted comments on the proposed Part 70 Operating Permit Renewal. The summary of the comments is as follows:

Comment 1:

The open flare has not been installed yet.

Response to Comment 1:

Further communication with the source revealed that this comment was referring to the enclosed flare. The open flare (FL2) was installed in July 2005 and the enclosed flare (FL4) was installed in December 2005. No changes have been made as a result of this comment.

Comment 2:

For Condition B.15 of the permit, change the reporting frequency to semiannual instead of quarterly, and add the following language to the condition "Deviations from any permit requirements…shall be reported to…within ten (10) calendar days from the date of discovery of the deviation *except as allowed for in 40 CFR 60, Subpart WWW or variances contained within the Collection and Control System Design Plan required pursuant to this rule."*

Response to Comment 2:

It is IDEM's policy that Title V sources are required to report on a quarterly basis. The current permit language allows the Permittee to comply with the NSPS according to the specific requirements of the NSPS. No changes were made as a result of this comment.

Comment 3:

Regarding Condition C.1, the welding, soldering and cutting activities at the landfill are for maintenance purposes only and are not related to manufacturing activities.

Response to Comment 3:

The welding, soldering and cutting activities at the landfill are not subject to any state requirements in the draft of the permit that went to Public Notice. No changes were made as a result of this comment. Condition C.1 is a standard condition included in all Title V permits and may not be specifically applicable to this source.

Comment 4:

Condition C.4 (Incineration) should be designated as not federally enforceable

Response to Comment 4:

The permit has been changed as follows:

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **This condition is not federally enforceable.**

Comment 5:

For Condition C.9 (formerly C.10) of the permit, change the monitoring requirements as follows to reflect the IDEM negotiated language of Part 70 permits for other MSW landfills as follows: "Unless otherwise specified in the permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance (except as otherwise provided for in 40 CFR 60, Subpart WWW~~W~~ **or variances contained within the Collection and Control System Design Plan required pursuant to this rule**).

Response to Comment 5:

The requested change might have the unintended effect of exempting certain equipment from the federal rule. Such a change would require prior approval by US EPA. No changes have been made as a result of this comment. The typographical errors in the reference to 40 CFR 60, Subpart WWW is corrected as follows:

C.~~10~~**9** Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance (except as otherwise provided for in 40 CFR 60, Subpart WWW~~W~~. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Comment 6:

The existing permit requires submitting reports on a semiannual basis, and the renewal permit requires submitting reports on a quarterly basis. The Permittee requests that the original semiannual reporting schedule be maintained.

Response to Comment 6:

It is IDEM's policy that Title V sources are required to report on a quarterly basis. No changes were made as a result of this comment.

Comment 7:

The permit should specify that the stationary internal reciprocating engines are not subject to the requirements of 40 CFR 63, Subpart ZZZZ and 40 CFR 60, Subpart WWW.

Response to Comment 7:

The applicability of the federal rules to the landfill gas engines are clearly specified in the Technical Support Document. The existing four (4) landfill gas fueled engine/generators (EG1

through EG4) have no applicable requirements under the New Source Performance Standard for Municipal Solid Waste Landfills, 40 CFR Part 60, Subpart WWW, and the National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills, 40 CFR 63, Subpart AAAA because these engines burn treated landfill gas. The existing four (4) landfill gas fueled engine/generators (EG1 through EG4) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ because this source is a minor source of HAPs. The permit has been changed as follows:

D.1.1 General Provisions Relating to NSPS and NESHAP [326 IAC 12-1-1][40 CFR Part 60, Subpart A]

…

(d) Pursuant to a letter from EPA Region V (dated March 4, 2004), the proposed gas recovery plant at Liberty Landfill, Inc. is considered a treatment system. The engines, which combust the treated landfill gas, are not subject to the testing requirements in 40 CFR 60.754, the monitoring requirements in 40 CFR 60.756, ~~and~~ the record keeping requirements in 40 CFR 60.758~~. The engines are also not subject to the requirements in 40 CFR 63, Subpart AAAA.~~**, the testing and monitoring requirements in 40 CFR 63.1960, and the recordkeeping and reporting requirements in 40 CFR 63.1980. The existing four (4) landfill gas fueled engine/generators (EG1 through EG4) have no applicable requirements under the New Source Performance Standard for Municipal Solid Waste Landfills, 40 CFR Part 60, Subpart WWW, and the National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills, 40 CFR 63, Subpart AAAA.**

(e) The existing four (4) landfill gas fueled engine/generators (EG1 through EG4) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ.

Comment 8:

Condition D.1.2(b) states the conditions under which positive pressures are allowed in the collection system. The Permittee has submitted a revised NSPS Design Plan to IDEM for approval. Please include the positive pressure limit directly into the permit.

Response to Comment 8:

The permit has been changed as follows:

D.1.2 Operational Standards for Collection and Control Systems [40 CFR 60.753] [326 IAC 8-8.1] [326 IAC 12]

…

(b) Operate the collection system with negative pressure at each wellhead except under the following conditions:

…

(2) Use of a geomembrane or synthetic cover. The Permittee shall ~~develop acceptable pressure limits in the design plan~~ **not exceed a maximum positive pressure limit of 5.0 inches water column**.

…

Comment 9:

Neither the enclosed flare or open flare is designed with a physical means of bypass. Therefore, the requirements of 40 CFR 60.756(b)(2) and (c)(2) do not apply.

Response to Comment 9:

In US EPA's "Municipal Solid Waste Landfill New Source Performance Standards (NSPS) and Emission Guidelines (EG) Questions and Answers" (dated November 1998 (Revised May 2002)), Page 38, it states that "The gas flow measurement or lock and key requirements would not apply to a system that is designed such that there is no physical means to bypass the gas flow before it reaches the control device." The Permittee has indicated that their control device has been designed without any physical means of bypass. Therefore, the gas flow monitoring requirements in Condition D.1.3(b) have been changed, and corresponding recordkeeping and reporting requirements in Conditions D.1.10(b)(2) (formerly D.1.11(b)(2)), D.1.10(c)(1) (formerly D.1.11(c)(1)) and D.1.11(c)(2) (formerly D.1.12(c)(2)) have been removed from the permit. The unit description in Conditions A.3(c), A.3(f) and Section D.1 have been revised to indicate that there is no bypass for the open flare or enclosed combustor.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

…

(c) One (1) enclosed ground flare, identified as FL4, installed in 2005, with a combustion capacity of 1,000 cubic feet per minute of landfill gas (LFG) per hour. **This flare does not have a bypass.**

…

(f) One (1) open flare, identified as FL2, constructed in 2005, with a maximum heat input capacity of 37.1 MMBtu per hour and a maximum flow rate of 1,362 scfm of landfill gas, and exhausting through stack FS2. **This flare does not have a bypass.**

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

..

(c) One (1) enclosed ground flare, identified as FL4, installed in 2005, with a combustion capacity of 1,000 cubic feet per minute of landfill gas (LFG) per hour. **This flare does not have a bypass.**

…

(f) One (1) open flare, identified as FL2, constructed in 2005, with a maximum heat input capacity of 37.1 MMBtu per hour and a maximum flow rate of 1,362 scfm of landfill gas, and exhausting through stack FS2. **This flare does not have a bypass.**

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

D.1.3 Monitoring [40 CFR 60.756][326 IAC 8-8.1][326 IAC 12]

…

(b) The Permittee uses an enclosed combustor to comply with 40 CFR 60.752(b)(2)(iii), and therefore shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment:

(1) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ±1 percent of the temperature being measured expressed in degrees Celsius of ±0.5 EC, whichever is greater. A temperature monitoring device is not required for boilers or process heaters with design heat input capacity greater than 44 megawatts.

(2) A device that records flow to ~~or bypass of~~ the control device. ~~The Permittee shall either; install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every fifteen (15) minutes; or secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration.~~

~~A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.~~

(c) The Permittee uses an open flare to comply 40 CFR 60.752(b)(2)(iii), and therefore shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:

(1) Heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame

(2) A device that records flow to ~~or bypass of~~ the flare. The Permittee shall ~~either:~~

~~(A)~~ install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every fifteen minutes**.** ~~; or~~

~~(B) secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. If the Permittee elects this option, a visual inspection of the seal or closure of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.~~

…

D.1.1~~1~~**0** Record Keeping Requirements [326 IAC 12] [40 CFR 60.758] [326 IAC 8-8.1] [326 IAC 2-7-10.5][326 IAC 8-1-6]

…

(b) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee of a controlled landfill shall keep up-to-date, readily accessible records for the life of the control equipment listed in (1) through (2) below as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring shall be maintained for a minimum of five (5) years. Records of control device vendor specifications shall be maintained until removal.

…

(2) The Permittee demonstrating compliance with 40 CFR 60.752(b)(2)(iii)(A) through use of an open flare shall record:

(A) The flare type (i.e., steam-assisted, air-assisted, or nonassisted), all visible emission readings, heat content determination, flow rate ~~or bypass flow rate~~ measurements, and exit velocity determinations made during the performance test as specified in 40 CFR 60.18.

(B) Continuous records of the flare pilot flame or flare flame monitoring and records of all periods of operations during which the pilot flame of the flare flame is absent.

(c) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee shall keep for five years up-to-date, readily accessible, continuous on-site records of the equipment operating parameters specified to be monitored in 40 CFR 60.756 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.

(1) The Permittee subject to 40 CFR 60.758 shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device ~~or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines,~~ specified under 40 CFR 60.756.

…

D.1.1~~2~~**1** Reporting Requirements [40 CFR 60.757] [326 IAC 8-8.1]

…

(c) Submit annual reports of the following recorded information. For enclosed combustion devices and flares, reportable exceedances are defined under 40 CFR 60.758(c).

(1) Value and length of time for exceedance of applicable parameters monitored under 40 CFR 60.756(a), (b), (c), and (d).

~~(2) Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under 40 CFR 60.756.~~

~~(3)~~**(2)** Description and duration of all periods when the control device was not operating for a period exceeding one (1) hour and length of time the control device was not operating.

~~(4)~~**(3)** All periods when the collection system was not operating in excess of five (5) days.

~~(5)~~**(4)** Location of each exceedance of the 500 parts per million methane concentration as provided in 40 CFR 60.753(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month.

~~(6)~~**(5)** Date of installation and the location of each well or collection system expansion added pursuant to 40 CFR 60.755(a)(3), (b), and (c)(4).

Pursuant to 40 CFR 63.1980, the Permittee is required to submit the above report on a semi-annual basis, as specified in Condition D.1.1~~3~~**2**(a).

…

Comment 10:

A Preventative Maintenance Plan is not required. Please remove this condition.

Response to Comment 10:

IDEM has determined that it is not necessary to include a condition requiring a preventive maintenance plan in each individual Section D of the permit. Rather, a general condition will be placed in Section B of the permit, which will apply to the entire source. D.1.6 has been removed from the permit and the remaining conditions re-numbered accordingly. Condition B.10(a) has been revised. Additionally, IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. The permit has been changed as follows:

B.10 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]

(a) ~~If required by specific condition(s) in Section D of this permit, t~~ **T**he Permittee shall **prepare,** maintain and implement Preventive Maintenance Plans (PMPs) ~~including the following information on each facility:~~ **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**

…

~~D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.~~

Comment 11:

For Conditions D.10(b) and (c) (formerly D.1.11 (b) and (c)) (Recordkeeping Requirements) of the permit, change the recordkeeping requirements to reflect the IDEM negotiated language of Part 70 permits for other MSW landfills as follows: "Except as provided in 40 CFR 60.752(b)(2)(i)(B), *or variances contained within the collection and control system design plan…"*

Response to Comment 11:

The requested change might have the unintended effect of exempting certain equipment from the federal rule. Such a change would require prior approval by US EPA. No changes were made as a result of this comment.

Comment 12:

Make a note in Condition D.1.11(c) (formerly D.1.12(c)) that this annual report is required to be submitted every six months pursuant to 40 CFR 63, Subpart AAAA.

Response to Comment 12:

The requested reference was included in the draft of the permit sent to Public Notice. No change will be made as a result of this comment.

Comment 13:

Revise Condition D.1.11(b) (formerly D.1.12(b)) to clarify that the 15-year control period begins upon operation of the gas collection and control system.

Response to Comment 13:

The permit has been changed as follows.

D.1.1~~2~~**1** Reporting Requirements [40 CFR 60.757] [326 IAC 8-8.1]

. . .

(b) Submit an equipment removal report to the IDEM, OAQ thirty (30) days prior to removal or cessation of operation of the control equipment. The equipment removal report shall contain all of the following items: a copy of the closure report submitted in accordance with 40 CFR 60.757(d), a copy of the initial performance test report demonstrating that the fifteen (15) year minimum control period has expired, and dated copies of three (3) successive NMOC emission rate reports demonstrating that the landfill is no longer producing 50 megagrams or greater of NMOC per year. **The fifteen year control period begins upon initial operation of the gas collection and control system.** The IDEM, OAQ may request such additional information as may be necessary to verify that all of the conditions for removal in 40 CFR 60.752(b)(2)(v) have been met.

…

Comment 14:

There should be no separate section for the engines that combust landfill gas. Instead, Condition D.1.1 should be revised to state that there are no applicable requirements under 40 CFR 63, Subpart AAAA and 40 CFR 63, Subpart ZZZZ for these engines.

Response to Comment 14:

The significant landfill gas engines (EG1 – EG4) are placed in Section D.2 specifically to indicate that there are no applicable requirements for these engines under state or federal rules. This is stated in the TSD and in Section D.2. No change will be made as a result of this comment.

Comment 15:

In the *Pollution Emission Units and Pollution Control Equipment* section of the TSD, Paragraph (f) should state that the open flare has not been installed in 2005.

Response to Comment 15:

Further communication with the source revealed that this comment was referring to the enclosed flare. The open flare (FL2) was installed in July 2005 and the enclosed flare (FL4) was installed in December 2005. No changes have been made as a result of this comment.

Comment 16:

In the Existing Approvals section of the TSD, the Administrative Amendments issued in 2005 are not listed.

Response to Comment 16:

Although the TSD does not list all of the Administrative Amendments, the draft permit on Public Notice incorporates all but one of the applicable changes. Further changes to the permit are necessary as a result of this comment. The Existing Approvals section of the TSD should read as follows:

Existing Approvals

The source has been operating under Operating Permit T181-7338-00035, issued July 26, 1999, and the following approvals:

(a) Reopening 181-13538-00035, issued December 10, 2001.

(b) **First** Administrative Amendment 181-16918-00035, issued May 7, 2003.

(c) First Minor Source Modification 181-18276-00035, issued March 15, 2004.

(d) First Significant Permit Modification 181-18503-00035, issued April 30, 2004.

(e) Second Minor Source Modification 181-18643-00035, issued June 16, 2004.

(f) Second Significant Permit Modification 181-18737-00035, issued June 24, 2004.

(g) Second Administrative Amendment 181-21165-00035, issued June 17, 2005.

(h) Third Administrative Amendment 181-21519-00035, issued July 20, 2005.

(i) Fourth Administrative Amendment 181-21824-00035, issued October 25, 2005.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical

Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Condition D.1.2(c) of the permit shall be changed as follows to incorporate changes made in the above Administrative Amendments. [Note: To avoid confusion between the identifications for emissions units in this Title V renewal T181-18254-00035 and Administrative Amendment 181-21824-00035, the 1,000 scfm enclosed flare added in 2005 during the Title V renewal process shall be identified as FL4, and NOT FL1. The 2,500 scfm enclosed flare (FL1) was replaced by the 1,000 scfm enclosed flare FL4.]

D.1.2 Operational Standards for Collection and Control Systems [40 CFR 60.753] [326 IAC 8-8.1] [326 IAC 12]

…

(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than the following and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent.

(1) Less than 138EF(59 ^{o}C) for well #50;

(2) Less than 135EF(57 ^{o}C) for well #51; and

(3) Less than 140EF(60 ^{o}C) for well #48; and

(4) Less than 131EF (55EC) for all other wells.

The Permittee may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. ~~A higher operating value demonstration shall~~ **The Permittee has** shown supporting data that the **above** elevated parameter**s** do~~es~~ not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

…

Comment 17:

The discussion of non-applicability for the engines should be more comprehensive. Please revise the seventh paragraph on page 10 of the TSD as follows: "…the gas recovery plant at Liberty Landfill Inc. is considered a treatment system and is not subject to **the requirements of 40 CFR 60, Subpart WWW and 40 CFR 63, Subpart AAAA."**

Response to Comment 17:

The gas treatment portion of the gas recovery plant is subject to the NSPS and the NESHAP, because it is a treatment system. 40 CFR 60.752(b)(2)(iii)(C) states that (C) "[the Permittee shall] Route the collected gas to a treatment system that processes the collected gas for subsequent sale or use. All emissions from any atmospheric vent from the gas treatment system shall be subject to the requirements of paragraph (b)(2)(iii) (A) or (B) of this section. Pursuant to a letter from EPA Region V (dated March 4, 2004), once the landfill gas is treated and sent to the engines, it is no longer subject to the NSPS. Therefore, the engines are not subject to the NSPS, 40 CFR 60, Subpart WWW or the NESHAPs, 40 CFR 63, Subparts AAAA and ZZZZ). However, the components of the gas treatment system upstream from the engines are subject to 40 CFR 63, Subpart WWWW and 40 CFR 63, Subpart AAAA. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 18:

Page 14 of the TSD should list the Federal Register date for the proposed revisions as May 23, 2002 and not May 22, 2002.

Response to Comment 18:

Paragraph (e) of the Federal Rule Applicability section of the TSD should read as follows:

(e) The requirements of 40 CFR 60, Subpart Cc, 40 CFR 60, Subpart WWW and 40 CFR 63, Subpart AAAA are not included in this permit for the four (4) 1,148 horsepower (8.9 MMBtu/hr) engines, identified as EG1 through EG4. These engine/generators use treated landfill gas as fuel. Pursuant to 40 CFR 60.752(b)(2)(iii), the Permittee is required to route all collected landfill gas to a control system that complies with the requirements in either paragraph (b)(iii)(A), (B), or (C) of 40 CFR 60.752. The Permittee, in conjunction with an onsite subcontractor, operates an energy recovery plant in which the landfill gas is collected and treated prior to use in the landfill gas-fueled engine/generators. The Permittee has chosen to treat the portion of landfill gas that is used in the engine/generators, pursuant to 40 CFR 60.752(b)(2)(iii)(C). The Permittee's treatment system meets the definition of a treatment system as defined by U.S. EPA in a notice of proposed rulemaking published in the Federal Register [67 FR 36480] on May ~~22~~ **23**, 2002. In a letter to the Permittee, dated March 4, 2004, the EPA states that "once the landfill gas is treated, the facilities that buy or use the gas have no further obligations under the NSPS (40 CFR 60, Subpart WWW). The treatment system fulfills the Permittee's requirements under 40 CFR 60, Subpart WWW. 40 CFR 60, Subpart WWW and, by extension, 40 CFR 60, Subpart Cc and 40 CFR 63, Subpart AAAA, do not regulate devices that use landfill gas after it is treated pursuant to 40 CFR 60.752(b)(2)(iii)(C). Therefore, the landfill gas-fueled engine generators are not subject to the requirements of 40 CFR 60, Subpart Cc, 40 CFR 60, Subpart WWW, or 40 CFR 63, Subpart AAAA.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 19:

Change the PSD discussion in the State Rule Applicability – Entire Source section of the TSD to reflect the fact that only four of the six permitted landfill gas engines were installed.

Response to Comment 19:

The PSD discussion in the draft of the TSD that was placed on Public Notice states that four engines were added in 2004.

Comment 20:

Change the New Source Toxics Control discussion in the State Rule Applicability – Entire Source section of the TSD to reflect the fact that the source is not a major source of HAPs, and has not installed any major sources of HAPs since July 27, 1997.

Response to Comment 20:

326 IAC 2-4.1-1 applies only to major sources of HAPs that are constructed or reconstructed (as defined in 40 CFR 63.41) after July 27, 1997 and that are not subject to a NESHAP. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 21:

No calculations were provided for the 6.6 MMBtu/hr leachate evaporator.

Response to Comment 21:

Appendix A to this document shows the revised calculations for this source. Changes are shown in bold. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents and the numbering of Conditions has been modified, if applicable, to reflect these changes.

1. Operation of Equipment was listed two places in the permit. IDEM has decided that it is best to have this requirement under compliance determination in the specific D conditions, and delete it from the C Section. The remaining conditions in Section C were re-numbered accordingly.

~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement for the landfill emissions unit shall be operated at all times that gas is extracted from the landfill emission unit.~~

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Liberty Landfill, Inc.
Source Location:	8635 East State Road 16, Monticello, Indiana 47960
County:	White
SIC Code:	4953
Operation Permit No.:	181-7338-00035
Operation Permit Issuance Date:	July 26, 1999
Permit Renewal No.:	181-18254-00035
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Liberty Landfill, Inc. relating to the operation of a stationary municipal solid waste landfill.

Source Definition

This municipal solid waste landfill consists of a source with an on-site contractor:

(a) Liberty Landfill, Inc., the primary operation, owns and operates a municipal solid waste landfill, located at 8653 East State Road 16, Monticello, Indiana 47960 (SIC: 4953); and

(b) Liquid Solutions, LLC, an on-site contractor, purchases and utilizes the landfill gas generated from Liberty Landfill, Inc. in the enclosed flare/leachate evaporator system

IDEM has determined that Liberty Landfill, Inc. and Liquid Solutions, LLC are considered one source due to contractural control. Therefore, the term “source” in the Part 70 documents refers to both Liberty Landfill, Inc. and Liquid Solutions, LLC.

History and Background

Liberty Landfill, Inc. was constructed in 1982. The maximum design capacity of the landfill was increased in 1993. The current maximum design capacity of the landfill is 11,086,700 cubic meters which is equivalent to 11,635,115 megagrams. The landfill accepts waste containing asbestos. The Permittee expects to close the landfill in 2020.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) solid waste disposal facility, as defined in 40 CFR 60.751, constructed in 1982, modified in 1993, with a maximum design capacity of 11,086,700 cubic meters (11,635,115 megagrams).

(b) One (1) gas collection system (GCS) designed and having a capacity in accordance with the applicable provisions of 40 CFR 60, Subpart WWW.

(c) One (1) enclosed ground flare, identified as FL4, installed in 2005, with a combustion capacity of 1,000 cubic feet per minute of landfill gas (LFG) per hour.

(d) One (1) Leachate Evaporation System identified as E-Vap, installed in 1998 and modified in 2005, with a maximum evaporation rate of 12,000 gallons per day, controlled by an integral enclosed flare FL4. The evaporator has a maximum heat input rate of 6.6 MMBtu/hr, using landfill gas as fuel. This system is used to process the leachate generated from this landfill and dilute industrial wastewater received from other plants.

(e) Four (4) 1,148 horsepower (8.9 MMBtu/hr) engines, identified as EG1 through EG4, constructed in 2005, using treated landfill gas as a fuel, each with a landfill gas input rate of 307 scfm of landfill gas, and exhausting through stacks ES1 through ES4, respectively. Each engine is equipped with a crankcase for engine oil, which consumes a maximum of 20 gallons of engine oil per month and exhausts through a crankcase breather vent. (The crankcase breather vent is an insignificant activity.)

(f) One (1) open flare, identified as FL2, constructed in 2005, with a maximum heat input capacity of 37.1 MMBtu per hour and a maximum flow rate of 1,362 scfm of landfill gas, and exhausting through stack FS2.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, not subject to 326 IAC 20-6, consisting of one (1) parts washing station, constructed in 2004, with a maximum capacity of 20 gallons. [326 IAC 8-3-2] [326 IAC 8-3-5]

(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(c) The following nine (9) leachate storage tanks:

(1) One (1) 15,000 gallon (56.78 cubic meters) leachate storage tank, identified as tank #3.

(2) Two (2) 10,000 gallon (37.85 cubic meters) leachate storage tanks, identified as tanks #1 and #2.

(3) One (1) 8,800 gallon (33.3 cubic meters) leachate sludge tank, identified as tank #4.

(4) Four (4) wastewater storage tanks, constructed in 2004, each with a maximum capacity of 8,000 gallons (33.3 cubic meters).

(5) One (1) wastewater storage tank, constructed in 2004, with a maximum capacity of 10,000 gallons (37.85 cubic meters).

(d) Space heaters, process heaters, or boilers using the following fuels:

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(2) Propane or liquified petroleum gas or butane-fired combustion sources with a heat input equal to or less than six million (6,000,000) Btu per hour.

(3) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(f) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(g) A petroleum fuel (other than gasoline) dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(h) The following VOC and HAP storage containers:

(1) Two (2) engine oil storage tanks, each with a maximum capacity of 1,000 gallons.

(2) One (1) antifreeze storage tank, with a maximum capacity of 550 gallons.

(i) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(j) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(l) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or

(2) Having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit);

The use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.

(m) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner or operator, that is, an on-site sewage treatment facility.

(n) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

(o) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

(p) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.

(q) Stockpiled soils from soil remediation activities that are covered and awaiting transport for disposal.

(r) Asbestos abatement projects regulated by 326 IAC 14-10.

(s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(t) Onsite fire and emergency response training approved by the department.

(u) Emergency gasoline generators not exceeding 110 horsepower.

(v) Emergency diesel generators not exceeding 1600 horsepower.

(w) A laboratory as defined in 326 IAC 2-7-1(21)(D), including one (1) process gas chromatograph.

(x) Farm operations.

(y) The following equipment related to equipment repair and maintenance activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(z) Activities with emissions equal to or less than the following thresholds: 0.6 tons per year or 3.29 pounds per day of lead; 25 pounds per day of carbon monoxide; 5 pounds per hour or 25 pounds per day of sulfur dioxide, particulate matter, and nitrogen oxides; 3 pounds per hour or 15 pounds per day of volatile organic compounds; 5 pounds per day or 1 ton per year of a single HAP; and 12.5 pounds per day or 2.5 tons per year combined HAPs, consisting of:

(1) One (1) leachate recirculation system.

(2) Stockpiles of petroleum-contaminated soils containing trace amounts of benzene, toluene, ethylbenzene and xylene, identified as PCS-COVER, to be used as alternate daily and intermediate cover.

(3) Industrial and municipal waste water solidification process, identified as SOLIDIF.

(4) Two (2) tipper engines for emptying refuse from truck beds, identified as TIPPER1, rated at 88 horsepower and 116 horsepower.

(5) Four (4) passive vent flares, each with a maximum capacity of 50 scfm of landfill gas.

(6) One (1) crankcase breather vent for the four (4) landfill gas engines.

Existing Approvals

The source has been operating under Operating Permit T181-7338-00035, issued July 26, 1999, and the following approvals:

(a) Reopening 181-13538-00035, issued December 10, 2001.

(b) Administrative Amendment 181-16918-00035, issued May 7, 2003.

(c) First Minor Source Modification 181-18276-00035, issued March 15, 2004.

(d) First Significant Permit Modification 181-18503-00035, issued April 30, 2004.

(e) Second Minor Source Modification 181-18643-00035, issued June 16, 2004.

(f) Second Significant Permit Modification 181-18737-00035, issued June 24, 2004.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

In Second Minor Source Modification 181-18643-00035, issued on June 16, 2004, the landfill was permitted to add a gas recovery plant, six landfill gas engines (EG1 – EG6) and a 1,362 scfm open flare (FL2). At the time of the modification, the source planned to remove an existing evaporator (E-vap) and an enclosed flare (FL1). This is noted in the equipment descriptions for these emission units. These emission units have not been removed, and are still operational at the source. No conditions in MSM 181-18737-00035 or SPM 181-18737-00035 required the removal of the flare (FL1) or the evaporator (E-vap). These emission units are included in this permit. The Permittee added only four (4) landfill gas engines instead of the six (6) proposed and installed the 1,362 scfm open flare in July 2005.

On August 23, 2005, the source proposed replacing the existing 2,500 scfm enclosed flare with a 1,000 scfm open flare. The PTE for PM, PM10, SO_2, NO_x, CO and VOC for this enclosed flare are below the thresholds requiring a minor source modification. The equipment descriptions have been revised to reflect this change.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on October 27, 2003.

Emission Calculations

See Appendix A of this document for LandGEM (version 2.01) calculations of uncontrolled fugitive emissions of methane, carbon monoxide and non-methane organic compounds (NMOC) from the landfill at closure. See Appendix B of this document for detailed calculations of PM, PM10, SO_2,

NO_X, VOC, CO and HAP emissions from the controlled landfill, open flare, enclosed combustor, four (4) landfill gas engine/generators, and the paved and unpaved roads.

Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

The source was issued a Part 70 Operating Permit on July 26, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Landfill	--	--	--	33.5	2.58	--	7.04
1,000 scfm Enclosed Flare (FL4)	2.2	2.2	8.4	0.7	23.9	7.2	3.43
Leachate Evaporation System (E-Vap)	0.5	0.5	2.0	0.2	5.8	1.7	
Four (4) 1,148 HP engine/generators (EG1 – EG4)	7.7	7.7	2.7	0.9	55.5	44.4	
1,362 scfm Open Flare (FL2)	3.04	3.04	11.5	0.96	60.1	11.1	
Paved and Unpaved Roads (fugitive)	11.2	2.9	--	--	--	--	--
Total PTE	12.9	12.9	8.0	36.0	145	63.3	10.5

"--" Emissions are negligible (less than 0.1 tons per year).
Fugitive particulate matter emissions from the paved and unpaved roads are not included in the source PTE because this source is not one of the 28 listed source categories, under 326 IAC 2-2-1(gg).

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of carbon monoxide is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The landfill increased its maximum design capacity in 1993. Since this source is a municipal solid waste landfill that was modified after May 30, 1991, it is subject to 40 CFR 60, Subpart WWW Standards of Performance for Municipal Solid Waste Landfills. Pursuant to the New Source Performance Standard for Municipal Solid Waste Landfills, 40 CFR 60, Subpart WWW, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM2.5	3
PM10	7
SO_2	2
VOC	2
CO	14
NO_x	8
HAP	Not reported

County Attainment Status

The source is located in White County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
1-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) 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. White County has been designated as attainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source Section.

(b) White County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source Section.

(c) White County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source Section.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The landfill and flares at this source are exempt from Compliance Assurance Monitoring under 40 CFR 64.2(b)(i), as they are regulated under emission limitations or standards (NSPS or NESHAP) proposed by the Administrator after November 15, 1990. The landfill gas-fueled engine/generators at this source are exempt from Compliance Assurance Monitoring under 40 CFR 64.2(b)(i), because none of these facilities has the potential to emit greater than 100 tons per year of any regulated pollutant prior to controls.

(b) The landfill, gas collection system and flares at this source are subject to the requirements of the New Source Performance Standard for Municipal Solid Waste Landfills, 40 CFR 60, Subpart WWW (326 IAC 12) because the design capacity of the landfill is greater than 2.5 million Megagrams and the municipal solid waste landfill was modified after May 30, 1991. The requirements of 40 CFR 60, Subpart WWW previously applied to this landfill and are contained in the source's Title V permit T181-7338-00035, issued on July 26, 1999.

The NMOC emissions from this landfill have exceeded 50 Mg/yr. Pursuant to 40 CFR 60.752(b)(2), the Permittee installed a landfill gas collection and control system to comply with the requirements of 40 CFR 60.752(b)(2) in 1996 and is currently operating the system.

In order to comply with 40 CFR 60.752 (b)(2)(ii), the Permittee shall:

(1) Operate the collection system such that gas is collected from each area, cell, or group of cells in the municipal solid waste landfill in which solid waste has been in place for five years if active or 2 years or more if closed or at final grade.

(2) Operate the collection system with negative pressure at each wellhead except under the following conditions:

(A) Fire or increased well temperature. The Permittee shall record instances when positive pressure occurs in an effort to avoid a fire. These records shall be submitted with the annual reports as provided in 40 CFR 60.757(f)(1).

(B) Use of a geomembrane or synthetic cover. The Permittee shall develop acceptable pressure limits in the design plan.

(C) A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the Office of Air Quality (OAQ).

(3) Operate each interior wellhead in the collection system with a landfill gas temperature less than 138°F(59 ^{o}C) for well #50, less than 135°F(57 ^{o}C) for well #51, less than 140°F)(60 ^{o}C) for well #48, and less than 131°F (55°C) for all other wells and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The Permittee may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

(A) The nitrogen level shall be determined using Method 3C, unless an alternative method is established as allowed by 40 CFR 60.752(b)(2)(i).

(B) Unless an alternative test method is established as allowed by 40 CFR 60.752(b)(2)(i), the oxygen shall be determined by an oxygen meter using Method 3A except that; the span shall be set so that the regulatory limit is between 20 and 50 percent of the span; a data recorder is not required; only two calibration gases are required, a zero and span, and ambient air may be used as the span; a calibration error check is not required; the allowable sample bias, zero drift, and calibration drift are ±10 percent.

(4) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the Permittee shall conduct surface testing around the perimeter of the collection area along a pattern that traverses the landfill at 30 meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The Permittee may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan shall be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30 meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.

(5) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 40 CFR 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within one hour.

(6) Operate the control system at all times when the collected gas is routed to the system.

(7) If monitoring demonstrates that the operational requirement in 40 CFR 60.753(b), (c), or (d) are not met, corrective action shall be taken as specified in 40 CFR 60.752(a)(3) through (5) or 40 CFR 60.755(c). If corrective actions are taken as specified in 40 CFR 60.755, the monitored exceedance is not a violation of the operational requirements in 40 CFR 60.753.

Pursuant to 40 CFR 60.752(b)(2)(iii), the landfill gas emitted from a landfill with NMOC emissions greater than 50 Mg/yr is required to be routed to a control system in either:

(1) an open flare;

(2) a control system or enclosed combuster designed to reduce NMOC by 98%; or

(3) a treatment system that processes the collected gas for subsequent sale or use.

This landfill is currently controlled by one (1) 1,000 scfm enclosed flare, one (1) 1,362 scfm open flare, one (1) 6.6 MMBtu/hr E-Vap, and a gas treatment system consisting of one (1) gas recovery plant and four (4) landfill gas engines installed under Minor Source Modification 181-18643-00035.

Pursuant to 40 CFR 60.756, a source using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:

(1) Heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame

(2) A device that records flow to or bypass of the flare. The Permittee shall either install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every fifteen minutes; or secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

Pursuant to 40 CFR 60.756, a source using an enclosed combustor shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment:

(1) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ±1 percent of the temperature being measured expressed in degrees Celsius of ±0.5°C, whichever is greater. A temperature monitoring device is not required for boilers or process heaters with design heat input capacity greater than 44 megawatts.

(2) A device that records flow to or bypass of the control device. The Permittee shall either; install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every fifteen (15) minutes; or secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration.

A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

The source has provided information to show that the landfill gas will be filtered, dewatered, and compressed before feeding to the engines. In addition, according to a letter from EPA Region V (dated March 4, 2004), the gas recovery plant at Liberty Landfill, Inc. is considered a treatment system and is not subject to the testing requirements in 40 CFR 60.754, the continuous temperature monitoring requirements in 40 CFR 60.756, or the record keeping requirements in 40 CFR 60.758.

Note that emissions from any atmospheric vent from the gas treatment system, including any compressor, is still subject to the emission control requirements of 40 CFR 60.752(b)(2)(iii)(A) and (B). This does not include exhausts from landfill gas combustion engines.

(c) The landfill, gas collection system and flares at this source are subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Municipal Solid Waste Landfills (40 CFR 63.1930 - 63.1952, Subpart AAAA). This source has accepted waste since November 8, 1987, has a design capacity greater than 2.5 million megagrams, and has uncontrolled NMOC emissions greater than 50 megagrams per year (Mg/yr). This landfill site does not include a bioreactor, as defined in 40 CFR 63.1990.

Since this NESHAP was promulgated on January 16, 2003, it was not included in the source's most recent Part 70 permit 181-7338-00035, issued July 26, 1999. The

conditions for the requirements of 40 CFR 63, Subpart AAAA will be added into this permit renewal. The additional conditions are listed as the following:

(1) Pursuant to 40 CFR 63.1955, the Permittee shall:

(A) Comply with the requirements of 40 CFR 60, Subpart WWW.

(B) The Permittee shall comply with the general and continuing compliance requirements in 40 CFR 63.1960 through 40 CFR 63.1985.

(C) For approval of collection and control systems that include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions, the Permittee must follow the procedures in 40 CFR 60.752(b)(2). If alternatives have already been approved under 40 CFR Part 60 Subpart WWW, these alternatives can be used to comply with 40 CFR 63, Subpart AAAA, except that all affected sources must comply with the Startup, Shutdown, and Malfunction (SSM) requirements in Subpart A of 40 CFR 63 as specified in Table 1 of 40 CFR 63, Subpart AAAA and all affected sources must submit compliance reports every 6 months as specified in 40 CFR 63.1980(a) and (b), including information on all deviations that occurred during the 6-month reporting period. Deviations (as defined in 40 CFR 63.1965) for continuous emission monitors or numerical continuous parameter monitors must be determined using a 3 hour monitoring block average (as defined in 40 CFR 63.1975).

(2) Pursuant to 40 CFR 63.1960, compliance with 40 CFR 63, Subpart AAAA is determined by the following:

(A) The same way it is determined for 40 CFR 60, Subpart WWW, including performance testing, monitoring of the collection system, continuous parameter monitoring, and other credible evidence.

(B) Continuous parameter monitoring data, collected under 40 CFR 60.756(b)(1), (c)(1), and (d) of Subpart WWW, are used to demonstrate compliance with the operating conditions for control systems. If a deviation (as defined in 40 CFR 63.1965) occurs, the Permittee has failed to meet the control device operating conditions described in 40 CFR 60, Subpart WWW and has deviated from the requirements of 40 CFR 63, Subpart AAAA.

(C) The Permittee must develop and implement a written SSM plan according to the provisions in 40 CFR 63.6(e)(3). A copy of the SSM plan must be maintained on site. Failure to write, implement, or maintain a copy of the SSM plan is a deviation from the requirements of 40 CFR 63, Subpart AAAA.

(3) Pursuant to 40 CFR 63.1980, the Permittee has the following record keeping and reporting requirements:

(A) The Permittee shall keep records and reports as specified in 40 CFR 60, Subpart WWW, with one exception: The Permittee must submit the annual report described in 40 CFR 60.757(f) every 6 months.

(B) The Permittee shall keep records and reports as specified in the general provisions of 40 CFR 60 and 40 CFR 63 as shown in Table 1 of 40 CFR

63, Subpart AAAA. Applicable records in the general provisions include items such as SSM plans and the SSM plan reports.

(d) This landfill accepts waste containing asbestos. Pursuant to 326 IAC 14-2-1, this source is subject to the National Emission Standards for Hazardous Air Pollutants for Asbestos Active Waste Disposal Sites (40 CFR 61.154, (Subpart M)). This rule requires that each Permittee of an active waste disposal site that receives asbestos-containing waste material from a source covered under 40 CFR 61.149, 61.150, or 61.155 shall meet the requirements of 40 CFR 61.154:

(1) Either there must be no visible emissions to the outside air from any active waste disposal site where asbestos-containing waste material has been deposited, or the requirements of 40 CFR 61.154(c) or 40 CFR 61.154(d) must be met.

(2) Unless a natural barrier adequately deters access by the general public, either warning signs and fencing must be installed and maintained as follows, or the requirements of 40 CFR 61.154(c)(1) must be met.

(A) Warning signs must be displayed at all entrances and at intervals of 100 meters (330 ft) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material is deposited. The warning signs must conform to the specifications set forth in 40 CFR 61.154(b)(1)(i-iii).

(B) The perimeter of the disposal site must be fenced in a manner adequate to deter access by the general public.

(C) Upon request and supply of appropriate information, the Administrator will determine whether a fence or a natural barrier adequately deters access by the general public.

(3) Rather than meet the no visible emission requirement of 40 CFR 61.154(a) at the end of each operating day, or at least once every 24-hour period while the site is in continuous operation, the asbestos-containing waste material that has been deposited at the site during the operating day or previous 24-hour period shall:

(A) Be covered with at least 15 centimeters (6 inches) of compacted nonasbestos-containing material, or

(B) Be covered with a resinous or petroleum-based dust suppression agent that effectively binds dust and controls wind erosion. Such an agent shall be used in the manner and frequency recommended for the particular dust by the dust suppression agent manufacturer to achieve and maintain dust control. Other equally effective dust suppression agents may be used upon prior approval by the Administrator. For purposes of this paragraph, any used, spent, or other waste oil is not considered a dust suppression agent.

(4) Rather than meet the no visible emission requirement of 40 CFR 61.154(a), use an alternative emissions control method that has received prior written approval by the Administrator according to the procedures described in 40 CFR 61.149(c)(2).

(5) For all asbestos-containing waste material received, the Permittee of the active waste disposal site shall:

(A) Maintain waste shipment records, and include the following information:

(i) The name, address, and telephone number of the waste generator.

(ii) The name, address, and telephone number of the transporter(s).

(iii) The quantity of the asbestos-containing waste material in cubic meters (cubic yards).

(iv) The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers. Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the disposal site, by the following working day, the presence of a significant amount of improperly enclosed or uncovered waste. Submit a copy of the waste shipment record along with the report.

(v) The date of the receipt.

(B) As soon as possible and no longer than 30 days after receipt of the waste, send a copy of the signed waste shipment record to the waste generator.

(C) Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity actually received, attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the disposal site. Describe the discrepancy and attempts to reconcile it, and submit a copy of the waste shipment record along with the report.

(D) Retain a copy of all records and reports required by 40 CFR 61.154(e) for at least two (2) years.

(6) Maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area.

(7) Upon closure, comply with all the provisions of 40 CFR 61.151.

(8) Submit to the Administrator, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities.

(9) Furnish upon request, and make available during normal business hours for inspection by the Administrator, all records required under 40 CFR 61.154.

(10) Notify the Administrator in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the Administrator at least ten (10) working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. Include the following information in the notice:

(A) Scheduled starting and completion dates.

(B) Reason for disturbing the waste.

(C) Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the Administrator may require changes in the emission control procedures to be used.

(D) Location of any temporary storage site and the final disposal site. (Sections 112 and 301(a) of the Clean Air Act as amended (42 U.S.C. 7412, 7601(a)).

The Permittee currently complies with the federal requirements by covering any asbestos-containing waste material that has been deposited with at least 15 centimeters (6 inches) of compacted non-asbestos containing material within a 24-hour period.

(e) The requirements of 40 CFR 60, Subpart Cc, 40 CFR 60, Subpart WWW and 40 CFR 63, Subpart AAAA are not included in this permit for the four (4) 1,148 horsepower (8.9 MMBtu/hr) engines, identified as EG1 through EG4. These engine/generators use treated landfill gas as fuel. Pursuant to 40 CFR 60.752(b)(2)(iii), the Permittee is required to route all collected landfill gas to a control system that complies with the requirements in either paragraph (b)(iii)(A), (B), or (C) of 40 CFR 60.752. The Permittee, in conjunction with an onsite subcontractor, operates an energy recovery plant in which the landfill gas is collected and treated prior to use in the landfill gas-fueled engine/generators. The Permittee has chosen to treat the portion of landfill gas that is used in the engine/generators, pursuant to 40 CFR 60.752(b)(2)(iii)(C). The Permittee's treatment system meets the definition of a treatment system as defined by U.S. EPA in a notice of proposed rulemaking published in the Federal Register [67 FR 36480] on May 22, 2002. In a letter to the Permittee, dated March 4, 2004, the EPA states that "once the landfill gas is treated, the facilities that buy or use the gas have no further obligations under the NSPS (40 CFR 60, Subpart WWW). The treatment system fulfills the Permittee's requirements under 40 CFR 60, Subpart WWW. 40 CFR 60, Subpart WWW and, by extension, 40 CFR 60, Subpart Cc and 40 CFR 63, Subpart AAAA, do not regulate devices that use landfill gas after it is treated pursuant to 40 CFR 60.752(b)(2)(iii)(C). Therefore, the landfill gas-fueled engine generators are not subject to the requirements of 40 CFR 60, Subpart Cc, 40 CFR 60, Subpart WWW, or 40 CFR 63, Subpart AAAA.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) (40 CFR 63, Subpart ZZZZ) are not included in this permit for the four (4) 1,148 horsepower (8.9 MMBtu/hr) engines, identified as EG1 through EG4, because these engines are not located at a major source of HAP emissions.

(g) The requirements of the National Emission Standards for Halogenated Solvent Cleaning (326 IAC 20-6, 40 CFR 63, Subpart T) are not included in this permit for the degreasing operations. The cold solvent cleaning machine does not use a solvent containing

methylene chloride, perchlorethylene, trichloretylene, 1,1,1-trichlorethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.

(h) The requirements of the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (40 CFR 60, Subpart Kb) are not included in this permit for the two (2) 37.85 cubic meter leachate storage tanks, the one (1) 56.78 cubic meter leachate storage tank, the four (4) 8,000 gallon wastewater storage tanks, the one (1) 10,000 gallon wastewater storage tank and the one (1) 33.3 cubic meter leachate sludge tank. The capacity of the tanks is less than 75 cubic meters.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Benzene Waste Operations (40 CFR 61, Subpart FF) are not included in this permit for the wastewater evaporation facilities at this source. This source is not a chemical manufacturing plant, a coke by-product recovery plant, or a petroleum refinery, and this source does not operate hazardous waste treatment, storage, and disposal facilities that treat, store, or dispose of hazardous waste generated by a chemical manufacturing plant, a coke by-product recovery plant, or a petroleum refinery.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants for Off-Site Waste and Recovery Operations (40 CFR 63, Subpart DD) are not included in this permit for the wastewater evaporation facilities at this source because this source is not a major source of hazardous air pollutant (HAP) emissions as defined in 40 CFR 63.2

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)
The source submitted an Emergency Reduction Plan (ERP) on October 22, 1999.

326 IAC 2-2 (Prevention of Significant Deterioration)
This source is not in 1 of the 28 source categories under 326 IAC 2-2-1(gg), therefore, fugitive emissions are not counted towards applicability of PSD.

This source was constructed in 1982. In 1993, the maximum design capacity of the landfill was increased to 10,140,000 megagrams. During the period of 1982 to 1996, the source was a minor PSD source.

In 1996, a landfill gas collection system and a 1,500 scfm open flare were added. The potential to emit of carbon monoxide from the 1,500 scfm open flare was 148 tons per year. The potential to emit for PM, PM10, SO_2, NO_X and VOC from the 1,500 scfm open flare were all less than eight (8) tons per year. Subsequent to the addition of the 1,500 scfm open flare, the source remained a minor PSD source.

In 1998, a 2,500 scfm enclosed flare and a leachate evaporation system were added. If it were to be operated at maximum capacity, the potential to emit of carbon monoxide from the 2,500 scfm enclosed flare would be 110 tons per year and the potential to emit for PM, PM10, SO_2, NO_X and VOC would be all less than 21 tons per year. Subsequent to the addition of the 2,500 scfm open flare, the source remained a minor PSD source. This is because the estimated actual emissions of CO from the 1,500 scfm open flare and the 2,500 scfm enclosed flare are 168 tons of CO per year and this is assuming that all landfill gas generated is burned (100% capture efficiency) in the flares. Therefore, the actual emissions of CO from the flares have not exceeded 250 tons per year.

In 2003, the source modified the leachate evaporation system and removed the existing 1,500 scfm open flare. This modification did not result in an increase in emissions, as the leachate

evaporation system utilized the heat from the 2,500 scfm enclosed flare. The source remained a minor source under PSD after this modification.

In 2004, the source was permitted to add four (4) 8.9 MMBtu/hr landfill gas engine/generators, and a 1,362 scfm open flare. This modification did not trigger PSD review because the increase in PTE for PM, PM10, CO, SO_2, NO_x and VOC due to this modification was less than 250 tons per year. Prior to the operation of the new equipment, the source submitted manufacturer's guaranteed emission factors for the new and existing equipment (FL1, FL2, E-Vap, EG1 – EG4) and indicated its intention to leave the existing emission control equipment (FL1 and E-Vap) in operation at the source. Calculations for source-wide PTE for the entire source subsequent to this modification show that the PTE for PM, PM10, SO_2, NO_x, CO and VOC for the entire source are less than 250 tons per year. Subsequent to this modification, the source remained a minor PSD source, as the potential to emit of all criteria pollutants from the source are less than 250 tons per year.

In 2005, during the Title V renewal process, the source removed the existing 2,500 scfm enclosed flare (FL1) and replaced it with a 1,000 scfm enclosed flare (FL4). This modification did not trigger PSD review because the PTE for PM, PM10, SO_2, NO_x, CO and VOC decreased as a result of this modification. The source remained a minor PSD source.

The source is a minor source under PSD.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source has not installed any new major sources of HAPs since July 27, 1997. Therefore the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. The next report is due July 1, 2007. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) 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.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. The source currently controls fugitive dust from the paved and unpaved roads by sweeping and applying water to the roads on an as-needed basis.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in White County, was constructed in 1982, and has the potential to emit greater than 25 tons per year of fugitive particulate matter. The source received all of the necessary pre-construction approvals before December 13, 1985 and has not added any new sources of fugitive dust after December 13, 1985. Therefore, the source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability – Municipal Solid Waste Landfill

326 IAC 8-8.1 (Municipal Solid Waste Landfills Not Located in Clark, Floyd, Lake, and Porter Counties)

This source is located in White County, has capacity available for future use and was constructed prior to May 30, 1991. It meets the definition of "existing municipal solid waste landfill" as defined in 326 IAC 8-8.1-2(b). Therefore, this landfill is subject to 326 IAC 8-8.1. 326 IAC 8-8.1 incorporates, by reference, all of the provisions of 40 CFR 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. Therefore, the landfill fulfills the requirements of 326 IAC 8-8.1 by following the requirements of 40 CFR 60, Subpart WWW.

State Rule Applicability – Flares and Engine/Generators

326 IAC 7-1.1 (Sulfur Dioxide Limitations)

The flares and engine/generators at this source do not have the potential to emit greater than 25 tons per year or 10 pounds per hour of sulfur dioxide. Therefore, the requirements of 326 IAC 7-1.1 do not apply to the utility flare or engine/generators.

326 IAC 9-1-2 (Carbon Monoxide Emission Requirements)

This source is not among the listed source categories in 326 IAC 9-1-2. Therefore, the requirements of 326 IAC 9-1-2 are not applicable to the flares or engines/generators.

326 IAC 10-1-3 (Nitrogen Oxide Emission Requirements)

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1-3 are not applicable to the flares or engines/generators.

State Rule Applicability – Leachate and Wastewater Storage Tanks

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The leachate and wastewater storage tanks are not subject to 326 IAC 8-9 because the source is not located in Clark, Floyd, Lake, or Porter County.

State Rule Applicability - Brazing Equipment, Cutting Torches, Soldering Equipment, Welding Equipment

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The cutting torches and welding activities at this source are related to routine fabrication, maintenance and repair of structures and equipment, and are not related to a commercial production process. Pursuant to 326 IAC 6-3-1(b)(13), the cutting torches and welding activities at this source are exempt form the requirements of 326 IAC 6-3-2.

State Rule Applicability – Degreaser/Parts Washing Operations

326 IAC 8-3-2 (Cold Cleaner Operations)

This degreaser is located in White County and was constructed after January 1, 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee of a cold cleaning facility shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operation requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

This degreaser is located in White County and does not have a remote solvent reservoir. Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(1) the solvent volatility is greater than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(2) the solvent is agitated; or

(3) the solvent is heated.

(b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(2) A water cover when solvent used is insoluble in, and heavier than, water.

(3) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility shall ensure that the following operating requirements are met:

(a) Close the cover whenever articles are not being handled in the degreaser.

(b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(c) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

The 1,000 scfm flare and the four (4) engine/generators do not have testing requirements for PM, PM10, NO_X, SO_2, VOC and CO. The 1,362 scfm open flare, by design, cannot be tested. Monitoring of the pilot flame is considered adequate for ensuring compliance with applicable requirements.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the approporiate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows.

1. The active landfill gas collection system has applicable monitoring conditions as specified below:

   Except as provided in 40 CFR 60.752(b)(2)(I)(B),

   (a) The Permittee shall install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and:

      (1) Measure the gauge pressure in the gas collection header on a monthly basis as provided in 40 CFR 60.755(a)(3); and

(2) Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis as provided in 40 CFR 60.755(a)(5); and

(3) Monitor temperature of the landfill gas on a monthly basis as provided in 40 CFR 60.755(a)(5).

(b) The Permittee shall monitor surface concentrations of methane according to the instrument specifications and procedures provided in 40 CFR 60.755(d). Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring.

2. The 1,362 scfm open flare (FL2) has applicable compliance monitoring conditions as specified below:

The Permittee uses an open flare to comply with 40 CFR 60.752(b)(2)(iii), and therefore shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:

(a) A heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame.

(b) A device that records flow to or bypass of the flare. The Permittee shall either:

(1) Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or

(2) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

3. The 1,000 scfm enclosed flare (FL4) has applicable compliance monitoring conditions:

The Permittee uses an enclosed combustor to comply with 40 CFR 60.752(b)(iii), and therefore shall calibrate, maintain, and operate according to the manufacturer’s specifications, the following equipment:

(a) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ±1 percent of the temperature being measured expressed in degrees Celsius of ±0.5 EC, whichever is greater. A temperature monitoring device is not required for boilers or process heaters with design heat input capacity greater than 44 megawatts.

(b) A device that records flow to or bypass of the control device. The Permittee shall either; install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every fifteen (15) minutes; or secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration.

A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

These monitoring conditions are necessary because the landfill gas collection system and the flares at the municipal solid waste landfill must operate properly to ensure compliance with 40 CFR 60, Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills) and 40 CFR 63, Subpart AAAA (National Emissions Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills).

Conclusion

The operation of this stationary municipal solid waste landfill shall be subject to the conditions of this Part 70 Renewal Permit T181-18254-00035

Appendix B: Emission Calculations
Combustion Emissions from the Proposed 1,000 scfm Enclosed Flare

Company Name: **Liberty Landfill, Inc.**
Address: **8635 East State Road 16, Monticello, Indiana 47960**
Title V: **T181-18254-00035**
Reviewer: **ERG/ST**
Date: **September 16, 2005**

Fuel Input MMBtu/hr	NMOC ppmv	Flow Rate * scfm	Facility Description:	Emissions Unit ID #
27.2	595	1,000	Enclosed Flare with a maximum capacity of 1,000 scfm	FL4

Pollutant Emission Factors for Flare						
Emission Unit	PM[a]	PM10[a]	SO_2[b]	NOx[d]	CO[d]	NMOC[c]
FL4	17	17	190	0.06	0.20	595
	(lb/MMscf)	(lb/MMscf)	(ppmv)	(lb/MMBtu)	(lb/MMBtu)	(ppmv)

Potential To Emit (tons/year)						
Emission Unit	PM	PM10	SO_2	NOx	CO	NMOC
FL4	2.23	2.23	8.42	7.16	23.9	0.71

Assume PM emissions equal to PM10 emissions.
[a] Emission Factors are from AP-42, Chapter 2.4 - Municipal Solid Waste Landfills, Table 2.4-5 (11/98).
[b] The total inlet sulfur concentration is provided by the source.
[c] The NMOC concentration is the default value in EPA Landfill Gas Emissions Model, Version 2.01 and AP-42.
[d] The emission factors for NOx and CO for flare (FL4) are guaranteed emission factors provided by the manufacturer.

Methodology
PM / PM10 Emissions (tons/year) = Flow Rate (scfm) x Emission Factor (lbs/MMscf) x 50% (Methane Content) x 60 (min/hour) x 8760 (hours/year) x 1 ton/2,000 lbs)
SO_2 Emissions (tons/year) = Flow Rate (scfm) x Emission Factor (ppmv) /1000,000 x 1 atm / Gas Constant (0.7302 atm-cf/lb mole-R) / Temp (60F+ 460)
x Mole weight of SO_2 (64 lbs/lbs mole) x 60 min/hour x 8760 hours/year x 1 ton/2000 lbs
NMOC Emissions (tons/year) = Flow Rate (scfm) x Emission Factor (ppmv) /1000,000 x 1 atm / Gas Constant (0.7302 atm-cf/lb mole-R) / Temp (60F+ 460)
x Mole weight of Hexane (lbs/lbs mole) x 60 min/hour x 8760 hour/year x 1 ton/2000 lbs x (1-98% control efficiency)
NOx / CO Emissions for Flares (tons/year) = Heat Input (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hours/year) x 1 ton/2,000 lbs

TSD Addendum Appendix A: Emission Calculations
Combustion Emissions from the Proposed 1,000 scfm Enclosed Flare and E-Vap

Company Name: Liberty Landfill, Inc.
Address: 8635 East State Road 16, Monticello, Indiana 47960
Title V: T181-18254-00035
Reviewer: ERG/ST
Date: **December 6, 2005**

Fuel Input MMBtu/hr	NMOC ppmv	Flow Rate * scfm	Facility Description:	Emissions Unit ID #
27.2	595	1,000	Enclosed Flare with a maximum capacity of 1,000 scfm	FL4
6.6	**595**	**242**	**Leachate Evaporator (E-Vap) with a maximum capacity of 6.6MMBtu/hr**	**E-Vap**

Pollutant Emission Factors for Flare						
Emission Unit	PM[a]	PM10[a]	SO_2[b]	NOx[d]	CO[d]	NMOC[c]
FL4 **and E-Vap**	17	17	190	0.06	0.20	595
	(lb/MMscf)	(lb/MMscf)	(ppmv)	(lb/MMBtu)	(lb/MMBtu)	(ppmv)

Potential To Emit (tons/year)						
Emission Unit	PM	PM10	SO_2	NOx	CO	NMOC
FL4	2.23	2.23	8.42	7.16	23.9	0.71
E-Vap	**0.54**	**0.54**	**2.04**	**1.73**	**5.8**	**0.17**

Assume PM emissions equal to PM10 emissions.
[a] Emission Factors are from AP-42, Chapter 2.4 - Municipal Solid Waste Landfills, Table 2.4-5 (11/98).
[b] The total inlet sulfur concentration is provided by the source.
[c] The NMOC concentration is the default value in EPA Landfill Gas Emissions Model, Version 2.01 and AP-42.
[d] The emission factors for NOx and CO for flare (FL4) **and E-Vap** are guaranteed emission factors provided by the manufacturer.

Methodology
PM / PM10 Emissions (tons/year) = Flow Rate (scfm) x Emission Factor (lbs/MMscf) x 50% (Methane Content) x 60 (min/hour) x 8760 (hours/year) x 1 ton/2,000 lbs)
SO_2 Emissions (tons/year) = Flow Rate (scfm) x Emission Factor (ppmv) /1000,000 x 1 atm / Gas Constant (0.7302 atm-cf/lb mole-R) / Temp (60F+ 460)
x Mole weight of SO_2 (64 lbs/lbs mole) x 60 min/hour x 8760 hours/year x 1 ton/2000 lbs
NMOC Emissions (tons/year) = Flow Rate (scfm) x Emission Factor (ppmv) /1000,000 x 1 atm / Gas Constant (0.7302 atm-cf/lb mole-R) / Temp (60F+ 460)
x Mole weight of Hexane (lbs/lbs mole) x 60 min/hour x 8760 hour/year x 1 ton/2000 lbs x (1-98% control efficiency)
NOx / CO Emissions for Flares (tons/year) = Heat Input (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hours/year) x 1 ton/2,000 lbs