

June 3, 2004

Certified Mail: 7000 0600 0023 5188 9207

Jerry Kreuzman
Republic Services of Indiana LP
832 Langsdale Avenue
Indianapolis, Indiana 46202

Re: Exempt Construction and Operation Status, 097-18976-00526

Dear Jerry Kreuzman:

The application from Republic Services of Indiana LP, received on April 26, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following operation of solid waste hauling and recycling, located at 832 Langsdale Avenue, Indianapolis, Indiana 46202, is classified as exempt from air pollution permit requirements:

- (a) Thirteen (13) natural gas fired space heaters, identified as SH-1 through SH-13, with a combined maximum capacity of 2.6 million Btu per hour (MMBtu/hr), installed prior to 1987.
- (b) Spray coating operations of painting and priming of metal roll-off containers, identified as PB-1, installed prior to 1986, with a maximum usage of 3,000 gallons of water reducible enamel paint per year, and 300 gallons of primer/enamel per year, controlled by a dry particulate filter, and exhausting to stack S1.
- (c) Four (4) metal inert gas (MIG) welding stations, installed prior to 1986, with a maximum capacity of one (1) pound per hour (lb/hr).

The following condition shall be applicable:

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:

- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period 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.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Environmental Services (OES) and Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Angelique Oliger at 327-2846 or aoliger@indygov.org.

Sincerely,

John B. Chavez
Administrator

aco

cc: Files
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, Angelique Oliger

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Republic Services of Indiana LP
Source Location: 832 Langsdale Avenue, Indianapolis, Indiana 46202
County: Marion
SIC Code: 3479, 7692
Operation Permit No.: 097-18976-00526
Permit Reviewer: Angelique Olinger

The Office of Environmental Services (OES) has reviewed an application from Republic Services of Indiana LP relating to the operation of solid waste hauling and recycling.

Source Definition

This solid waste hauling, and recycling company consists of two (2) plants:

- (a) Plant 829 is located at 829 Langsdale Avenue, Indianapolis, Indiana 46202; and
- (b) Plant 832 is located at 832 Langsdale Avenue, Indianapolis, Indiana 46202.

While the two (2) plants are located on contiguous properties, and are owned by one (1) company, they will be considered two (2) separate sources. The two (2) plants have different SIC codes and one plant does not support the other.

Plant 829 has an SIC code of 4212. Plant 832 has SIC codes of 3479, 5093, and 7692. Each plant could function independently without the support of the other. This exemption only covers the facilities existing as Plant 832.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) Thirteen (13) natural gas fired space heaters, identified as SH-1 through SH-13, with a combined maximum capacity of 2.6 million Btu per hour (MMBtu/hr), installed prior to 1987.
- (b) Spray coating operations of painting and priming of metal roll-off containers, identified as PB-1, installed prior to 1986, with a maximum usage of 3,000 gallons of water reducible enamel paint per year, and 300 gallons of primer/enamel per year, controlled by a dry particulate filter, and exhausting to stack S1.
- (c) Four (4) metal inert gas (MIG) welding stations, installed prior to 1986, with a maximum capacity of one (1) pound per hour (lb/hr).

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the operation 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.

A complete application for the purposes of this review was received on April 26, 2004.

Emission Calculations

See Appendix A (three pages) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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 department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	1.9
PM-10	1.9
SO ₂	negligible
VOC	4.9
CO	1.0
NO _x	1.2
Cyanide	0.64
Glycol ethers	0.75
Cobalt	0.02
Ethyl Benzene	0.19
Xylene	0.93
Total HAPs	2.42

- (1) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.9
PM10	1.9
SO ₂	negligible
VOC	4.9
CO	1.0
NO _x	1.2
Single HAP	0.93
Combination	2.42

- (a) This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Steam generating units that have a maximum design heat input capacity of less than ten (10) million Btu per hour (10 mm Btu/hr) are not subject to 40 CFR Part 60 Subpart Dc. Therefore, this source is not subject to 40 CFR Part 60 Subpart Dc.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

This source is not subject to 326 IAC 1-6, because the source is not required to obtain a permit under 326 IAC 2.

326 IAC 2-4.1 (Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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 6-1 (Nonattainment Area Limitations)

Since the source does not have the potential to emit greater than 100 tons per year of particulate matter, or actual emissions of greater than 10 tons per year of particulate matter, and it is not one of the sources listed in 326 IAC 6-1-12, 326 IAC 6-1 does not apply.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The natural gas fired space heaters, identified as SH-1 to SH-13, are not subject to the provisions of 326 IAC 6-2-1(d) because they are not sources of indirect heating.

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

- (a) Pursuant to 326 IAC 6-3-1(b)(9), this rule does not apply to the welding operations because less than six hundred twenty-five (625) pounds of rod or wire is consumed per day.

- (b) Pursuant to 326 IAC 6-3-1(b)(15), this rule does not apply to the surface coating operations, identified as PB-1 because less than five (5) gallons of paint is used per day.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule does not apply to this source because the potential to emit is less than twenty-five (25) tons per year or ten (10) pounds per hour of Sulfur Dioxide.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Republic Services of Indiana LP has no facility with potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-1-6 does not apply.

326 IAC 8-2 (Surface Coating Emission Limitations)

Construction of the surface coating operations, identified as PB-1, commenced after January 1, 1980, and they have potential emissions of less than twenty-five (25) tons per year of VOC, and they have actual emissions of less than fifteen (15) pounds per day. Therefore, they are not subject to 326 IAC 8-2 (Surface Coating Emission Limitations).

Conclusion

This operation of solid waste hauling and recycling shall be exempt from air pollution control permit requirements by exemption 097-18976-00526.

**Appendix A: Emission Calculations
Natural Gas Combustion Only**

Company Name: Republic Services of Indiana LC
Address City IN Zip: 832 Langsdale Avenue, Indianapolis, Indiana 46202
Exemption: 097-18976-00526
Reviewer: Angelique Oliger
Date: May 14, 2004

Heat Input Capacity (MMBtu/hr)	Natural Gas Potential Throughput (MMCF/yr)
SH-1	0.1
SH-2	0.1
SH-3	0.3
SH-4	0.2
SH-5	0.1
SH-6	0.1
SH-7	0.3
SH-8	0.3
SH-9	0.3
SH-10	0.2
SH-11	0.3
SH-12	0.3
SH-13	0.3
TOTAL	2.7

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Potential Emission in tons/yr	13.7	13.7	0.6	100.0	5.3	84.0
	0.1644	0.1644	0.0072	1.2001	0.0636	1.0081

Methodology

MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors for NOx: uncontrolled = 100, Low NOx Burner = 17, Flue gas recirculation = 36
 Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Republic Services of Indiana LC
Address City IN Zip: 832 Langsdale Avenue, Indianapolis, Indiana 46202
CP: 097-18976-00526
Reviewer: Angelique Oligier
Date: May 14, 2004**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Usage (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Transfer Efficiency
BFI Blue	8.530	73.30%	61.2%	12.1%	62.7%	22.65%	0.343	2.76	2.76	0.95	22.69	4.14	0.85	75%
Tan	9.19	66.45%	54.3%	12.1%	59.9%	24.05%	0.343	2.78	2.78	0.95	22.85	4.17	1.16	75%
Stanley Red	8.53	71.30%	58.8%	12.5%	60.2%	24.74%	0.343	2.68	2.68	0.92	22.03	4.02	0.92	75%
Deck Red	9.52	60.18%	48.0%	12.2%	54.9%	28.59%	0.343	2.57	2.57	0.88	21.13	3.86	1.42	75%
Container Brown	8.79	69.69%	57.1%	12.6%	60.3%	24.02%	0.343	2.78	2.78	0.95	22.85	4.17	1.00	75%
Recycle Brown	8.70	70.57%	58.2%	12.3%	60.8%	23.92%	0.343	2.74	2.74	0.94	22.52	4.11	0.96	75%
Waste Mangement Green	8.60	71.01%	58.1%	13.0%	59.9%	24.29%	0.343	2.78	2.78	0.95	22.85	4.17	0.94	75%
Emerald Green	8.69	71.56%	59.8%	11.8%	62.4%	23.04%	0.343	2.72	2.72	0.93	22.36	4.08	0.93	75%
Dumpster Green	8.63	72.53%	61.4%	11.1%	63.6%	22.79%	0.343	2.64	2.64	0.90	21.70	3.96	0.89	75%
Dark Green	8.57	72.99%	60.5%	12.5%	62.2%	22.63%	0.343	2.84	2.84	0.97	23.34	4.26	0.87	75%
Battleship Gray	9.07	69.28%	58.3%	11.0%	63.5%	22.34%	0.343	2.73	2.73	0.94	22.44	4.10	1.04	75%
J-Prime Fast Dry Universal Primer, White	12.39	29.43%	0.0%	29.4%	0.0%	49.70%	0.034	3.64	3.64	0.12	3.00	0.55	0.33	75%
Guard Fast Dry Alkyd Enamel, Black	8.52	43.27%	0.0%	43.3%	0.0%	42.98%	0.034	3.69	3.69	0.13	3.04	0.55	0.18	75%
Guard Fast Dry Alkyd Enamel, Safety Yellow	8.42	39.80%	0.0%	39.8%	0.0%	48.08%	0.034	3.35	3.35	0.11	2.76	0.50	0.19	75%

State Potential Emissions

Add worst case coating to all solvents

4.81

1.75

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

