



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 7, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: National Serv-All Landfill / SSM 003-19047-00257

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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. 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:

- (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.

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
FNPER.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
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October 7, 2004

Mr. Dan Magoun
National Serv-All Landfill
832 Langsdale Avenue
Indianapolis, IN 46202

Re: 003-19047
First Significant Source Modification to
Part 70 Permit No.: 003-19047-00257

Dear Mr. Magoun:

National Serv-All Landfill was issued a Part 70 permit on July 12, 1999, for the operations of a stationary municipal solid waste landfill (MSLWLF). An application to modify the source was received by the Office of Air Quality (OAQ) on April 30, 2004. Pursuant to the provisions of 326 IAC 2-7-10.5, a significant source modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification is as follows:

- (a) replace the existing 66 MMBtu/hr open flare with one (1) 5,000 scfm (145 MMBtu/hr) open flare, identified as EU-3, with landfill gas usage restricted to 4,500 scfm.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new open flare, identified as EU-3. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Rajesh Thotakura, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3216, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
RT / EVP

- c: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector – Jennifer Dorn
Compliance Data Section - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**National Serv-All Landfill
6231 McBeth Road
Fort Wayne Indiana 46809**

(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.

First Significant Source Modification.: SSM 003-19047-00257	Pages Affected: All
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 7, 2004

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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 (MSLWLF).

Responsible Official:	Regional Environmental Manager
Source Address:	6231 McBeth Road, Fort Wayne, IN 46809
Mailing Address:	6231 McBeth Road, Fort Wayne, IN 46809
General Source Phone Number:	765-983-9278
SIC Code:	4953
County Location:	Allen
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 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 stationary municipal solid waste landfill with a design capacity of 10,000,000 megagrams, constructed in 1960.
- (b) One (1) 148.5 MMBtu/hr flare with a maximum capacity of 5,000 scfm of landfill gas usage, identified as EU-3, constructed in 2004.

A.3 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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 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]

This permit 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.

B.3 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.4 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.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 1st of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
 - (c) 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 PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
 - (d) 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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) 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]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- by this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.14 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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.15 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.16 Permit Renewal [326 IAC 2-7-4]

- (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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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.
 - (2) If IDEM, OAQ, upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- 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.18 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.19 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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.

B.20 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.21 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.22 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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.23 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.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

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 [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) 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. This condition is not federally enforceable.

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. 326 IAC 9-1-2 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 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 shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.

C.7 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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.8 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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.9 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.10 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. 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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.11 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.12 Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 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 6, 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.14 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.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 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.17 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 2007 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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.18 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 makes 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.19 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. This report shall be submitted within thirty (30) days of the end of the reporting period. 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 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 stationary municipal solid waste landfill with a design capacity of 10,000,000 megagrams.
- (b) One (1) 148.5 MMBtu/hr flare with a maximum capacity of 5,000 scfm of landfill gas usage, identified as EU-3, constructed in 2004.

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

Emissions Standards and Limitations

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][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, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart WWW.
- (b) 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.
- (c) 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.

D.1.2 PSD Minor Limit [326 IAC 2-2]

- (a) The input of landfill gas (LFG) into the flare shall be less than 2,365 million standard cubic feet per 12 consecutive month period, with compliance determined at the end of each month.

The landfill gas (LFG) usage limit is required to limit the potential to emit of CO to less than 241 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Municipal Solid Waste Landfill NSPS [326 IAC 12] [40CFR 60.752, Subpart WWW]

The municipal solid waste landfill has a design capacity greater than 2.5 million megagrams (Mg) and shall either comply with 40CFR 60.752 (b) (2) or calculate the non methane organic compound (NMOC) emission rate for the landfill using the procedures specified in 40CFR 60.754.

D.1.4 Operational Standards for Collection and Control Systems [40CFR 60.753]

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 develop acceptable pressure limits in the design plan.
 - (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 55° C and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent (except for the landfill gas well, LFGASB16, which can have an oxygen level less than 16.9 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.
- (1) The nitrogen level shall be determined using Method 3C, unless an alternative method is established as allowed by 40CFR 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 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 40CFR 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.1.5 National Emission Standards for Hazardous Air Pollutants for Active Asbestos Waste Disposal Sites (40 CFR 61.154, Subpart M)

Pursuant to National Emission Standards for Hazardous Air Pollutants 326 IAC14-2-1, (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 (b) or (c) below.
- (b) At the end of each operating day or 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 non asbestos 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 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 51cm 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).

D.1.6 Municipal Solid Waste Landfill NESHAP [326 IAC 20] [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) If the permittee is required by 40 CFR 60.752(b)(2) to install a collection and control system, the source 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, record keeping 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 or the Federal plan, or EPA approved and effective State or tribal plan, these alternatives can be used to comply with this subpart, except that all affected sources must comply with the startup, shutdown, and malfunction (SSM) requirements in Subpart A of this part 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 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).

Compliance Determination Requirements

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

- (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:

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

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):
- Pursuant to 40 CFR 60.752 (b)(2)(iii)(A), route all the collected landfill gas (LFG) to open flare that is designed and operated in accordance to 40 CFR 60.18 procedures.
- (c) Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.8 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 this subpart.
- (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 this subpart.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring [40 CFR 60.756]

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

- (a) The Permittee seeking to comply with 40 CFR 60.752(b)(2)(ii)(A) for an active gas collection 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 FR 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 seeking to comply with 40CFR 60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturers 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.

Installation, calibration, maintenance, and operation according to the manufacturers specifications the equipment as specified in 40 CFR 60.756 (c) (2) (i.e., Condition D.1.9 (b) (2)) will ensure compliance with Condition D.1.2.

- (c) The Permittee seeking to install a collection system that does not meet the specifications in 40 CFR 60.759 or seeking to monitor alternative parameters to those required by 40 CFR 60.753 through 40 CFR 60.756 shall provide information satisfactory to the Office of Air Quality (OAQ) as provided in 40 CFR 60.752(b)(2)(i)(B) and (C) describing the design and operation of the collection system, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Office of Air Quality (OAQ) may specify additional appropriate monitoring procedures.
- (d) The Permittee seeking to demonstrate compliance with 40 CFR 60.755(c), 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.1.10 Compliance Provisions [40CFR 60.755]

- (a) Except as provided in 40CFR 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)(i).
 - (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 (AP42) or other site-specific values demonstrated to be appropriate and approved by the Office of Air Quality (OAQ). If k has been determined as specified in 40 CFR 60.754(a)(4), the value of k determined from the test 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:

$$Q_M = \sum_{i=1}^n 2 k L_o M_i (e^{-kt})$$

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 i^{th} section, megagrams

t_i = age of the i^{th} 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.
- (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 CFR 60, 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 within 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 40CFR 60.755(c)(4)(v) of this section 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 remonitoring 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 40CFR 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 the 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 startup, 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.

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

D.1.11 Reporting Requirements [40CFR 60.757]

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

- (a) Submit an amended design capacity report to the Office of Air Quality (OAQ) providing notification of any increase in the design capacity of the landfill.
- (b) Submit a closure report to the Office of Air Quality (OAQ) within thirty days of waste acceptance cessation. The Office of Air Quality (OAQ) may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40CFR 258.60. If a closure report has been submitted to the Office of Air Quality (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).
- (c) Submit an equipment removal report to the Office of Air Quality (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 Office of Air Quality (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.
- (d) Annual reports of the following recorded information. The initial annual report shall be submitted within 180 days of installation and start-up of the collection and control system, and shall include the initial performance test report required under 40CFR 60.8. 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 40CFR 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) 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) All periods when the collection system was not operating in excess of five (5) days.
 - (5) Location of each exceedance of the 500 parts per million methane concentration as provided in 40CFR 60.753(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month.
 - (6) 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).
- (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 Requirements [326 IAC 12] [40CFR 60.758]

Pursuant to 40CFR 60.758

- (a) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee subject to 40CFR 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, 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 (a) through (d) 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) Where the Permittee subject to the provisions of 40 CFR 60.758 seeks to demonstrate compliance with 40CFR 60.752(b)(2)(ii):

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). 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) Where the Permittee subject to the provisions of 40 CFR 60.758 seeks to demonstrate compliance with 40 CFR 60.752(b)(2)(iii)(A) through use of an open flare, 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; 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.
 - (3) Where the Permittee subject to the provisions of 40 CFR 60.758 seeks to demonstrate compliance with 40 CFR 60.752(b)(2)(iii)(A) through use of an open flare, 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; 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 of a controlled landfill subject to the provisions of this subpart shall keep for 5 years up-to-date, readily accessible continuous 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.
 - (2) The Permittee seeking to comply 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 subject to the provisions of this subpart 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 subject to the provisions of this subpart shall keep for at least 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) Landfill owners or operators who convert design capacity from volume to mass or mass to volume to demonstrate that landfill design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, as provided in the definition of design capacity, shall keep readily accessible, on-site records of the annual recalculation of site-specific density, design capacity, and the supporting documentation. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable.

D.1.13 Record keeping for NESHAP for Asbestos Active Waste Disposal Sites [40 CFR 61.154]

- (a) For all asbestos containing waste material received, the owner or operator of the active waste disposal site shall:
- (1) Maintain waste shipment records, using a form similar to that shown in figure 4 of 40 CFR 61, Subpart M, 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 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.

D.1.14 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, or in the Federal plan, EPA approved State plan or tribal plan that implements 40 CFR 60, Subpart Cc, whichever applies to this landfill, with one exception: The Permittee must submit the annual report described in 40 CFR 60.757(f) every six (6) months.
- (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.

D.1.15 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2 the Permittee shall maintain monthly records of Landfill gas combusted by the open flare. Records maintained shall be complete and sufficient to establish compliance with Landfill gas usage limit established in D.1.2
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: National Serv-All Landfill
Source Address: 6231 McBeth Road, Fort Wayne, In 46809
Mailing Address: 6231 McBeth Road, Fort Wayne, In 46809
Part 70 Permit No.: T003-7675-00257

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
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: National Serv-All Landfill
Source Address: 6231 McBeth Road, Fort Wayne, In 46809
Mailing Address: 6231 McBeth Road, Fort Wayne, In 46809
Part 70 Permit No.: T003-7675-00257

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C 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); andC 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: National Serv-All Landfill
Source Address: 6231 McBeth Road, Fort Wayne, In 46809
Mailing Address: 6231 McBeth Road, Fort Wayne, In 46809
Part 70 Permit No.: T003-7675-00257

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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 this permit, shall be reported according to the schedule stated in the applicable requirement and do 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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: National Serv-All Landfill
Source Address: 6231 McBeth Road, Fort Wayne, In 46809
Mailing Address: 6231 McBeth Road, Fort Wayne, In 46809
Part 70 Permit No.: T003-7675-00257
Facility: Open Flare
Parameter: Landfill gas usage
Limit: The input of landfill gas (LFG) into the flare shall be less than 2,365 million standard cubic feet per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	National Serv-All Landfill
Source Location:	6231 McBeth Road Fort Wayne Indiana 46809
County:	Allen
SIC Code:	4953
Operation Permit No.:	T003-7675-00257
Operation Permit Issuance Date:	July 12, 1999
Significant Source Modification No.:	SSM 003-19047-00257
Significant Permit Modification No.:	SPM 003-19181-00257
Permit Reviewer:	RT/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from National Serv- All Landfill, relating to the operation of a stationary municipal solid waste landfill (MSLWLF).

History

National Serv-All Landfill, formerly known as National Serv-All Landfill/ McBeth Road Landfill was issued Part 70 operating permit T003-7675-00257 on July 12, 1999. On April 30, 2004, National Serv-All Landfill submitted an application to OAQ to replace 66 MMBtu per hour existing open flare with one (1) new 5,000 scfm (148.5 MMBtu/Hr) new open flare, identified as EU-3, with landfill gas usage restricted to 2,365 million cubic feet per year (equivalent to 4,500 scfm).

Explanation of Modification Requested

On April 30, 2004, National Serv-All Landfill submitted a request to:

- (a) replace the existing 66 MMBtu/hr open flare with one (1) 5,000 scfm(148.5 MMBtu/hr) open flare, identified as EU-3, with landfill gas usage restricted to 4,500 scfm.

Currently, National Serv-All Landfill has a permit to operate two (2) open flares with a combined heat input capacity of 132 MMBtu per hour. The source has installed one (1) open flare with a capacity of 66 MMBtu per hour in 1996. The second 66 MMBtu per hour open flare was never installed. The source is proposing to install a new open flare, identified as EU-3, having a maximum capacity of 5,000 scfm of landfill gas usage rate. According to US EPA, the heating value of landfill gas (LFG) is 550 Btu per scf. The potential CO emissions from the open flare (EU-3), utilizing the emission factor of 0.37 lb per MMBtu provided by LFG Specialties Inc. (manufacturer) and based on the 5,000 scfm of landfill gas usage, is 267.4 tons per year. To render PSD not applicable, the source is willing to restrict the landfill gas usage rate to 4,500 scfm. The usage rate of 2,365 million cubic feet per year (equivalent to 4,500 scfm) will limit the CO emissions to less than 241 tons per year from the open flare and compliance with this limit will render PSD not applicable.

The existing source is a minor PSD stationary source because the source criteria pollutant emissions, after all applicable limits and standards, are less than or limited to less than the respective major source levels of 250 tons per year. As a result of this modification, the CO emissions from open flare, identified as EU-3, are 241 tons per year. After this modification, the entire source CO emissions will be 241 tons per year. The source will remain as a minor source for PSD applicability after this approval.

Existing Approvals

The source was issued a Part 70 Operating Permit (T003-7675-00257) on July 12, 1999. The source has since then received the following:

- (a) First administrative amendment no. 003-12577-00257, issued on October 2, 2000; and
- (b) Second administrative amendment no. 003-12820-00257, issued on December 8, 2000.

Enforcement Issue

There are no enforcement actions with the equipment proposed in the modification.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (°F)
3	One (1) Open flare	50	17.625	5,000 (restricted to 4,500)	1400

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification and Significant Permit Modification 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 application for the purposes of this review was received on April 30, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Five (5) pages).

Potential to Emit Before Controls for the Modification

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."

This table reflects the PTE before controls due to the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	8.89
PM-10	8.89
SO ₂	9.9
VOC	62.28
CO	241
NO _x	44.23

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	2.00
Combined HAPs	8.76

Justification for Modification

The Part 70 operating permit is being modified through both Part 70 Significant Source Modification and Significant Permit Modification. The source is replacing an existing 66 MMBtu per hour open flare with one (1) 5,000 scfm (148.5 MMBtu/hr) open flare. This will result in the increase in potential emissions of criteria pollutants from the entire source. Since the increase in the potential emissions due to this modification are greater than 100 tons per year of CO, this modification is reviewed as significant source modification, pursuant to 2-7-10.5 (f) (7). The source is taking a usage limit of 2,365 million cubic feet per year (equivalent to 4,500 scfm) of landfill gas (LFG), to limit source wide CO emissions to less than 241 tons per year and render 326 IAC 2-2 (PSD) not applicable. Therefore, pursuant to 326 IAC 2-7-12(d), this modification request is reviewed as significant permit modification.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Non- Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.

- (b) Allen County has been classified as attainment or unclassifiable in Indiana for 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 for the source section.
- (c) 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 emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects calendar year 2001 emissions, based upon the Indiana Air Emission Summary Data for criteria pollutants.

Pollutant	Emissions (ton/yr)
PM	52.84
PM-10	52.84
SO ₂	2.9
VOC	8.76
CO	67
NO _x	12

Existing 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):

	PM (tons/yr)	PM10 (tons/yr)	SO ₂ (tons/yr)	NO _x (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	1.76	1.76	4.4	19.71	13.74	107	-	15.9

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) This existing source is not a major PSD stationary source because the source criteria pollutant emissions, after all applicable limits and standards, are less than or limited to less than the respective major source levels of 250 tons per year, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the application and technical supporting document for Part 70 permit T003-7675-00257, issued on July 12, 1999.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	NO _x	VOC	CO	Haps	
							Single	Total
New Open Flare	8.89	8.89	9.9	44.23	1.25	241	3.11	8.76
Total Emissions due to modification	8.89	8.89	9.9	44.23	1.25	241	3.11	8.76

This modification to an existing major stationary source is not a major PSD modification because the modification will limit CO emissions from open flare to less than 250 tons per year.

Emissions After the Modification

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
New Open Flare	8.89	8.89	9.9	44.23	1.25	241	3.11	8.76
Landfill	0.00	0.00	0.00	0.00	13.18	0	2.41	7.14
Source wide emissions	8.89	8.89	9.9	44.23	14.43	241	5.52	15.90

PSD Major Levels	250	250	250	250	250	250	-	26.82
Part 70 Major Levels	-	100	100	100	100	100	10	25

This source after the proposed modification is still a minor PSD stationary source because the CO emissions are less than 250 tons per year.

Federal Rule Applicability

- (a) The municipal solid waste landfill is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.750, Subpart WWW) because the municipal solid waste landfill commenced construction, reconstruction or modification or began accepting waste on or after May 30, 1991.

The requirements given below, as described in the part 70 permit no. T003-7675-00257, issued on July 12, 1999, continue to apply to open flare (EU-3):

- (1) Pursuant to 40 CFR 60.756 (c), the flame presence and flow monitoring requirements;
 - (2) Pursuant to 40 CFR 60.757, the annual GCCS reporting requirements; and
 - (3) Pursuant to 40 CFR 60.758, the recordkeeping requirements.
- (b) This source is 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.

The following requirements mentioned below apply to the open flare (EU-3):

- (1) Pursuant to 40 CFR 63, Subpart AAAAA, startup/ shutdown/ malfunction plan has to be maintained onsite; and
 - (2) Pursuant to 40 CFR 63, Subpart AAAAA, the semi-annual GCCS reporting requirements.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this modification.
- (d) 40 CFR 64, Compliance Assurance Monitoring

The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
- (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
- (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This source was issued initial Part 70 permit no. T003-7675-00257, on July 12, 1999. The open flare, identified as EU 3, as PSEU has uncontrolled PTE of CO at greater than 100 percent of the applicable major Part 70 threshold, but does not use a control device to control CO emissions. Therefore, the PSEU as open flare does not meet the criteria for Compliance Assurance Monitoring applicability.

State Rule Applicability - Entire Source and Individual Facilities

326 IAC 2-2 (PSD Minor Limit)

The source has always been a minor source for PSD applicability. The installation of 5,000 scfm (148.5 MMBtu/hr) open flare (EU-3) is major because the potential to emit CO is greater than 250 tons per year. However, the source is taking a landfill gas usage limit of 2,365 million cubic feet per year (equivalent to 4,500 scfm) for the open flare (EU-3). This usage limit in conjunction with CO emission factor of 0.37 lb per MMBtu provided by LFG Specialties Inc. (manufacturer) will limit the potential to emit of CO to less than 241 tons per 12 consecutive month period from the open flare (EU-3) and compliance with this limit renders PSD not applicable. The source will remain as a minor stationary source after the increase because the potential to emit of CO from the source will be less than 250 tons per year.

326 IAC 2-3 (Emission Offset)

Nonattainment New Source Review

Allen County has been designated as nonattainment for the 8-hour ozone standard on June 15, 2004. VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. The potential to emit of VOC and NO_x, due to the installation of 5,000 scfm (148.5 MMBtu/hr) open flare, is 1.25 tons per year and 44.23 tons per year respectively. The source wide potential to emit of VOC and NO_x, after modification, is less than 100 tons per year respectively. Therefore, the requirement of nonattainment new source review does not apply.

Testing Requirements

326 IAC 2-7-6(1), (6), 40 CFR 60.754(b) (Testing Requirements)

Pursuant to 40 CFR 60.752 (b)(2)(iii)(A), route all the collected landfill gas (LFG) to open flare that is designed and operated in accordance to 40 CFR 60.18 procedures.

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 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 appropriate corrective actions within a specific time period.

The current compliance monitoring requirements in sections D.1 and D.2 of the Part 70 permit do not change as a result of the this modification.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T003-7675-00257), issued July 12, 1999: New language is shown in **bold** and deleted language is shown with a ~~line through it~~ for emphasis).

1. Section A.2 (Emission Units and Pollution Control Equipment Summary) is revised to reflect the addition of one (1) 5,000 scfm open flare for this modification, as follows:

- A.2 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 stationary municipal solid waste landfill with a design capacity of 10,000,000 megagrams, constructed in 1960.
 - (b) ~~Two (2) flares with a combined capacity of 132 million (MM)BTU per hour constructed in 1996.~~ **One (1) 148.5 MMBtu/hr flare with a maximum capacity of 5,000 scfm of landfill gas usage, identified as EU-3, constructed in 2004.**
2. Section D.1 conditions (facility description and operating conditions) are revised to reflect the addition of one (1) 5,000 scfm open flare for this modification, as follows:

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One stationary municipal solid waste landfill with a design capacity of 10,000,000 megegrams.
- (b) ~~Two (2) flares with a combined capacity of 132 million (MM)BTU per hour constructed in 1996.~~ **One (1) 148.5 MMBtu/hr flare with a maximum capacity of 5,000 scfm of landfill gas usage, identified as EU-3, constructed in 2004.**

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

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][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, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart WWW.
- (b) 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.
- (c) **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.**

D.1.2 PSD Minor Limit [326 IAC 2-2]

- (a) **The input of landfill gas (LFG) into the flare shall be less than 2,365 million standard cubic feet per 12 consecutive month period, with compliance determined at the end of each month.**

The landfill gas (LFG) usage limit is required to limit the potential to emit of CO to less than 241 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.6 Municipal Solid Waste Landfill NESHAP [326 IAC 20] [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) **If the source is required by 40 CFR 60.752(b)(2) to install a collection and control system, the source 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, record keeping 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 or the Federal plan, or EPA approved and effective State or tribal plan, these alternatives can be used to comply with this subpart, except that all affected sources must comply with the startup, shutdown, and malfunction (SSM) requirements in Subpart A of this part 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).**

D.1.5 7 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 60.754(b)]

- (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:

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

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 98% reduction weight percent efficiency of NMOC from the control device or the 20 ppmv hexane on a dry basis at 3% oxygen outlet concentration level, or if the control device is an open flare, 40 CFR 60.18 procedures can be used, 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:~~

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

~~where,
NMOC_{in} = mass of NMOC entering the control device
NMOC_{out} = mass of NMOC exiting control device~~

Pursuant to 40 CFR 60.752 (b)(2)(iii)(A), route all the collected landfill gas (LFG) to open flare that is designed and operated in accordance to 40 CFR 60.18 procedures.

- (c) **Testing shall be conducted in accordance with Section C - Performance Testing.**

D.1.8 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 this subpart.**
- (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 this subpart.

D.1.69 Monitoring [40 CFR 60.756]

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

- (a) The Permittee seeking to comply with 40 CFR 60.752(b)(2)(ii)(A) for an active gas collection 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 FR 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 seeking to comply with 40 FR 60.752(b)(2)(iii) using an enclosed combustor shall calibrate, maintain, and operate according to the manufacturers specifications, the following equipment:~~
 - ~~(1) A temperature monitoring device equipped with a continuous recorder and having minimum accuracy of ± 1 percent of the temperature being measured expressed in degrees Celsius of $\pm 0.5^{\circ}\text{C}$, 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.~~

- ~~(c)~~ **(b)** The Permittee seeking to comply with 40CFR 60.752(b)(2)(iii) **and condition D.1.2** using an open flare shall install, calibrate, maintain, and operate according to the manufacturers 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.

- ~~(d)~~ The Permittee seeking to comply with 40 CFR 60.752(b)(2)(iii) using a device other than an open flare or an enclosed combustor shall provide information satisfactory to the Office of Air Quality (OAQ) as provided in 40 CFR 60.752(b)(2)(i)(B) describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Office of Air Quality (OAQ) shall review the information and either approve it, or request that additional information be submitted. The Office of Air Quality (OAQ) may specify additional monitoring procedures.
- (e) (c) The Permittee seeking to install a collection system that does not meet the specifications in 40 CFR 60.759 or seeking to monitor alternative parameters to those required by 40 CFR 60.753 through 40 CFR 60.756 shall provide information satisfactory to the Office of Air Quality (OAQ) as provided in 40 CFR 60.752(b)(2)(i)(B) and (C) describing the design and operation of the collection system, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Office of Air Quality (OAQ) may specify additional appropriate monitoring procedures.
- (f) (d) The Permittee seeking to demonstrate compliance with 40 CFR 60.755(c), 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.

Reason Removed: Paragraph (b) and (d) are removed from condition D.1.6 (now renumbered as D.1.9) because the source does not operate an enclosed combustor or any other device, other than open flare.

D.1.710 Compliance Provisions [40CFR 60.755]

- (a) Except as provided in 40CFR 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)(i).
- (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 (AP42) or other site-specific values demonstrated to be appropriate and approved by the Office of Air Quality (OAQ). If k has been determined as specified in 40 CFR 60.754(a)(4), the value of k determined from the test 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 i^{th} section, megagrams

t_i = age of the i^{th} 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 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.~~

D.1.8 Flare Temperature

~~Pursuant to CP 003-6024 issued October 29, 1996, the Permittee shall record the operating temperature of the flame at least once per day. Unless operated under conditions for which the preventive maintenance plan specifies otherwise, the flame temperature shall be maintained at a minimum of 1400 degrees F or a minimum temperature exit velocity established during the latest stack test. The Compliance Response Plan for this unit shall contain trouble shooting contingency and response steps for when the temperature below the above mentioned minimum for any one reading.~~

Reason Removed: This condition is from a construction permit issued in 1996, for the existing flare that will be removed after the new flare is installed and operated properly. The construction permit has no basis/citation for 1400 degrees F limit. Furthermore, 40 CFR 60, Subpart WWWW and 40 CFR 63, Subpart AAAA does not require the temperature of an open flare to be monitored. Therefore these requirements are removed from this modification.

D.1.9 Non Methane Organic Compound (NMOC) Rate Calculation [40 CFR 60.754]

~~Pursuant to 40 CFR 60.754 the Permittee shall:~~

- ~~(a) Calculate the non methane organic compound (NMOC) emission rate using either the equation provided in 40 CFR 60.754(a)(1)(i) or the equation provided in 40 CFR 60.754(a)(1)(ii). Both equations may be used if the actual year to year solid waste acceptance rate is known, as specified in 40 CFR 60.754(a)(1)(i), for part of the life of the landfill and the actual year to year solid waste acceptance rate is unknown, as specified in paragraph 40 CFR 60.754(a)(1)(ii), for part of the life of the landfill. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for L_0 , and 4,000 parts per million by volume as hexane for the C_{NMOC} . For landfills located in geographical areas with a thirty year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the k value to be used is 0.02 per year.~~

~~The following equation shall be used if the actual year to year solid waste acceptance rate is known:~~

$$\overline{M}_{NMOC} = \sum_{i=1}^n 2 k L_0 M_i (e^{-kt_i}) (C_{NMOC}) (3.6 \times 10^{-9})$$

~~where,~~

~~M_{NMOC} = Total NMOC emission rate from the landfill, megagrams per year
 k = methane generation rate constant, year⁻¹
 L_0 = methane generation potential, cubic meters per megagram solid waste
 M_i = mass of solid waste in the i^{th} section, megagrams
 t_i = age of the i^{th} section, years
 C_{NMOC} = concentration of NMOC, parts per million by volume as hexane
 3.6×10^{-9} = conversion factor~~

~~The mass of the nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value for M_i if documentation of the nature and amount of such wastes is maintained.~~

~~The following equation shall be used if the actual year to year solid waste acceptance rate is unknown:~~

$$M_{\text{NMOC}} = 2 L_0 R (e^{-kc} - e^{-kt})(C_{\text{NMOC}})(3.6 \times 10^{-9})$$

where,

M_{NMOC} = mass emission rate of NMOC, megagrams per year
 L_0 = 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 landfill, years
 C_{NMOC} = concentration of NMOC, parts per million by volume as hexane
 c = time since closure, years. For active landfill $c = 0$ and $e^{-kc} = 1$
 3.6×10^{-9} = conversion factor

The mass of the nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value for M_i if documentation of the nature and amount of such wastes is maintained.

- (b) Tier 1. The Permittee shall compare the calculated NMOC mass emission rate to the standard of 50 megagrams per year.

If the NMOC emission rate calculated in 40 CFR 60.754(a)(1) is less than 50 megagrams per year, then the landfill owner shall submit an emission rate report as provided in 40 CFR 60.757(b)(1), and shall recalculate the NMOC mass emission rate annually as required under 40 CFR 60.752(b)(1). If the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, then the Permittee shall either comply with 40 CFR 60.752(b)(2), or determine a site-specific NMOC concentration and recalculate the NMOC emission rate using the procedures provided in 40 CFR 60.754(a)(3).

Tier 2. The Permittee shall determine the NMOC concentration using the following sampling procedure. The Permittee shall install at least two sample probes per hectare of landfill surface that has retained waste for at least 2 years. If the landfill is larger than 25 hectares in area, only 50 samples are required. The sample probes should be located to avoid known areas of nondegradable solid waste. The Permittee shall collect and analyze one sample of landfill gas from each probe to determine the NMOC concentration using Method 25C of appendix A of 40 CFR 60 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). If composite sampling is used, equal volumes shall be taken from each sample probe. If more than the required number of samples are taken, all samples shall be used in analysis. The Permittee shall divide the NMOC concentration from Method 25C of appendix A by six to convert from C_{NMOC} as carbon to C_{NMOC} as hexane.

The Permittee shall recalculate the NMOC mass emission rate using the equations provided in 40 CFR 60.754(a)(1)(i) and (a)(1)(ii) and using the average NMOC concentration from the collected samples instead of the default value in the equation provided in 40 CFR 60.754(a)(1).

If the resulting mass emission rate calculated using the site-specific NMOC concentration is equal to or greater than 50 megagrams per year, then the Permittee shall either comply with 40 CFR 60.752(b)(2), or determine the site-specific methane generation rate constant and recalculate the NMOC emission rate using the site-specific methane generation rate using the procedure specified in 40 CFR 60.754(a)(4).

If the resulting NMOC mass emission rate is less than 50 megagrams per year, the Permittee shall submit a periodic estimate of the emission rate report as provided in 40 CFR 60.757(b)(1) and retest the site-specific NMOC concentration every five (5) years using the methods in 40 CFR 60.754(a)(3).

~~Tier 3. The site-specific methane generation rate constant shall be determined using the procedures provided in Method 2E of appendix A of 40 CFR 60. The Permittee shall estimate the NMOC mass emission rate using equations in 40 CFR 60.754(a)(1)(i) or (a)(1)(ii) and using a site-specific methane generation rate constant k, and the site-specific NMOC concentration as determined in 40 CFR 60.754(a)(3) instead of the default values provided in 40 CFR 60.754(a)(1). The Permittee shall compare the resulting NMOC mass emission rate to the standard of 50 megagrams per year.~~

~~If the NMOC mass emission rate as calculated using the site-specific methane generation rate and concentration of NMOC is equal to or greater than 50 megagrams per year, the Permittee shall comply with 40 CFR 60.752(b)(2).~~

~~If the NMOC mass emission rate is less than 50 megagrams per year, then the Permittee shall submit a periodic emission rate report as provided in 40 CFR 60.757(b)(1) and shall recalculate the NMOC mass emission rate annually, as provided in 40 CFR 60.757(b)(1) using the equations in 40 CFR 60.754(a)(1) and using the site-specific methane generation rate constant and NMOC concentration obtained in 40 CFR 60.754(a)(3). The calculation of the methane generation rate constant is performed only once, and the value obtained from this test shall be used in all subsequent annual NMOC emission rate calculations.~~

~~The Permittee may use other methods to determine the NMOC concentration or a site-specific k as an alternative to the methods required in 40 CFR 60.754(a)(3) and (a)(4) if the method has been approved by the Administrator.~~

- ~~(c) When calculating emissions for PSD purposes, the owner or operator of each municipal solid waste landfill subject to 40 CFR 60.754 shall 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).~~

Reason Removed: Condition D.1.9 is removed from the modification because the source calculated NMOC rate using method 25, 2E (Tier 2) and based on the calculations performed the resultant NMOC rate is greater than 50 megagrams per year. Since the NMOC rate is greater than 50 megagrams, the source is complying with the requirements of 40 CFR 60.752 (b) (2).

D.1.40 11 Reporting Requirements [40CFR 60.757]

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

- (a) ~~Submit an initial design capacity report to the Office of Air Quality (OAQ) no later than 90 days after October 8, 1997. An amended design capacity report shall be submitted to the Office of Air Quality (OAQ) providing notification of any increase in the design capacity of the landfill. The Permittees initial design capacity report was submitted on June 17, 1996.~~
Submit an amended design capacity report to the Office of Air Quality (OAQ) providing notification of any increase in the design capacity of the landfill.

- ~~(b) — Submit a non methane organic compound (NMOC) emission rate report to the Office of Air Quality initially and annually thereafter, except as provided for in 40 CFR 60.757(b)(1)(ii) or (b) (3). The Office of Air Quality (OAQ) may request such additional information as may be necessary to verify the reported NMOC emission rate. The report should contain an annual or 5 year estimate of the non methane organic compound (NMOC) emission rate using the formula and procedures provided in 40 CFR 60.754 (a) or (b), as applicable. The initial NMOC emission rate report may be combined with the initial design capacity report required in 40 CFR 60.757(a) and shall be submitted no later than indicated in paragraphs 40 CFR 60.757(b)(1)(i)(A) and (B). June 10, 1996 for landfills that commenced construction, modification, or reconstruction on or after May 30, 1991, but before March 12, 1996, or ninety days after the date of commenced construction, modification, or reconstruction for landfills that commence construction, modification, or reconstruction on or after March 12, 1996. Subsequent NMOC emission rate reports shall be submitted annually thereafter, except as provided in 40 CFR 60.757(b)(1)(ii) and (b)(3). If the estimated NMOC emission rate as reported in the annual report to the Office of Air Quality (OAQ) is less than 50 megagrams per year in each of the next five (5) consecutive years, the Permittee may elect to submit an estimate of the NMOC emission rate for the next five (5) year period in lieu of the annual report. This estimate shall include the current amount of solid waste in place and the estimated waste acceptance rate for each year of the five (5) years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based shall be provided to the Office of Air Quality (OAQ). This estimate shall be revised at least once every five (5) years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the five (5) year estimate, a revised five (5) year estimate shall be submitted to the Office of Air Quality. The revised estimate shall cover the five (5) year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate. The NMOC emission rate report shall include all the data, calculations, sample reports, and measurements used to estimate the annual or five (5) year emission rate. The Permittee is exempted from the requirements of 40 CFR 60.757(b)(1) and (2) after the installation of a collection and control system in compliance with 40 CFR 60.752 (b)(2), during such time as the system is in operation and in compliance with 40 CFR 60.753 and 60.755.~~
- (c) — Submit a collection and control system design plan to the Office of Air Quality (OAQ) within one (1) year of the first non methane organic compound (NMOC) emission rate report, required under 40 CFR 60.757(b), in which NMOC emission rate exceeds 50 megagrams (Mg) per year; except if the Permittee elects to recalculate the NMOC emission rate after Tier 2 sampling and analysis as provided in 40CFR 60.754(a)(3) and the resulting rate is less than 50 megagrams per year, annual periodic reporting shall be resumed, using the Tier 2 determined site specific NMOC concentration, until the calculated emission rate is equal to or greater than 50 megagrams per year or the landfill is closed. The revised NMOC emission rate report, with the recalculated emission rate based on NMOC sampling and analysis, shall be submitted within 180 days of the first calculated exceedance of 50 megagrams per year. If the Permittee elects to recalculate the NMOC emission rate after determining a site specific methane generation rate constant (k), as provided in Tier 3 in 40 CFR 60.754(a)(4), and the resulting NMOC emission rate is less than 50 megagrams per year, annual periodic reporting shall be resumed. The resulting site specific methane generation rate constant (k) shall be used in the emission rate calculation until such time as the emissions rate calculation results in an exceedance. The revised NMOC emission rate report based on the provisions of 40 CFR 60.754(a)(4) and the resulting site specific methane generation rate constant (k) shall be submitted to the Office of Air Quality (OAQ) within one (1) year of the first calculated emission rate exceeding 50 megagrams per year.
- ~~(d)(b)~~ Submit a closure report to the Office of Air Quality (OAQ) within thirty days of waste acceptance cessation. The Office of Air Quality (OAQ) may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40CFR 258.60. If a closure report has been submitted to the Office of

Air Quality (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).

- ~~(e)~~(c) Submit an equipment removal report to the Office of Air Quality (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 Office of Air Quality (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.
- ~~(f)~~(d) Annual reports of the following recorded information. The initial annual report shall be submitted within 180 days of installation and start-up of the collection and control system, and shall include the initial performance test report required under 40CFR 60.8. 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 40CFR 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) 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) All periods when the collection system was not operating in excess of five (5) days.
 - (5) Location of each exceedance of the 500 parts per million methane concentration as provided in 40CFR 60.753(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month.
 - (6) 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).
- ~~(g)~~ The Permittee seeking to comply with 40 CFR 40.752(b)(2)(iii) shall include the following information with the initial performance test report required under 40CFR 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 non productivity 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 provision for the control of off-site migration.~~

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

Reason removed: Paragraph (a) is removed from condition D.1.10 (now renumbered as D.1.12) because the source already submitted initial design capacity report on June 17, 1996. Paragraph (b) is removed from condition D.1.10 (now renumbered as D.1.12) because the source has installed collection and control equipment. Paragraph (c) is removed from condition D.1.10 (now renumbered as D.1.12) because the source has submitted collection and control system design plan to IDEM on June 13, 1997 and the IDEM has approved the plan. Paragraph (g) is removed from condition D.1.10 (now renumbered as D.1.12) because the source has conducted initial performance test on June 25, 1997 and the report was submitted and approved by IDEM.

D.1.12 12 Record Keeping Requirements [326 IAC 12] [40CFR 60.758]

Pursuant to 40CFR 60.758

- (a) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee subject to 40CFR 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, 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 (a) through (d) 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) Where the Permittee subject to the provisions of 40 CFR 60.758 seeks to demonstrate compliance with 40CFR 60.752(b)(2)(ii):
- 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). 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) — Where the Permittee subject to the provisions of 40 CFR 60.758 seeks to demonstrate compliance with 40 CFR 60.752(b)(2)(iii) through use of an enclosed combustion device other than a boiler or process heater with a design heat input capacity greater than 44 megawatts:
The average combustion temperature measured at least every fifteen (15) minutes and averaged over the same time period of the performance test. The percent reduction of NMOC determined as specified in 40 CFR 0.752(b)(2)(iii)(B) achieved by the control device.~~

- ~~(3)~~(2) Where the Permittee subject to the provisions of 40 CFR 60.758 seeks to demonstrate compliance with 40 CFR 60.752(b)(2)(iii)(B)(1) through use of a boiler or process heater of any size: a description of the location at which the collected gas vent stream is introduced into the boiler or process heater over the same time period of the performance testing.
- ~~(4)~~(3) Where the Permittee subject to the provisions of 40 CFR 60.758 seeks to demonstrate compliance with 40 CFR 60.752(b)(2)(iii)(A) through use of an open flare, 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; 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 of a controlled landfill subject to the provisions of this subpart shall keep for 5 years up-to-date, readily accessible continuous 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 following constitute exceedances that shall be recorded and reported under 40 CFR 60.757(f):
- ~~For enclosed combustors except for boilers and process heaters with design heat input capacity of 44 megawatts (150 million British thermal unit per hour) or greater, all 3-hour periods of operation during which the average combustion temperature was more than 28EC below the average combustion temperature during the most recent performance test at which compliance with 40CFR 60.752(b)(2)(iii) was determined. For boilers or process heaters, whenever there is a change in the location at which the vent stream is introduced into the flame zone as required under 40 CFR 60.758(b)(3)(i) of this section.~~
- ~~(2)~~(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.
- ~~(3)~~ — The Permittee subject to the provisions of 40 CFR 60.758 who uses a boiler or process heater with a design heat input capacity of 44 megawatts or greater to comply with 40 CFR 60.752(b)(2)(iii) shall keep an up-to-date, readily accessible record of all periods of operation of the boiler or process heater. (Examples of such records could include records of steam use, fuel use, or monitoring data collected pursuant to other State, local, Tribal or Federal regulatory requirements.)
- ~~(4)~~(2) The Permittee seeking to comply 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 subject to the provisions of this subpart 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 non-degradable 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 subject to the provisions of this subpart shall keep for at least 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) Landfill owners or operators who convert design capacity from volume to mass or mass to volume to demonstrate that landfill design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, as provided in the definition of design capacity, shall keep readily accessible, on-site records of the annual recalculation of site-specific density, design capacity, and the supporting documentation. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable.

Reason Removed: Paragraph (b) (3) and (c) (1), (c) (3) are removed from condition D.1.12 (now renumbered as D.1.13) because the source does not operate an enclosed combustor or any other device, other than open flare.

D.1.14 Record Keeping and Reporting Requirements for NESHP 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, or in the Federal plan, EPA approved State plan or tribal plan that implements 40 CFR 60, Subpart Cc, whichever applies to this landfill, with one exception: The Permittee must submit the annual report described in 40 CFR 60.757(f) every 6 months.**
- (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.**

~~D.1.13~~ 15 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.1.10, the Permittee shall maintain records of temperature of the flare.~~
- (a) To document compliance with Condition D.1.2, the Permittee shall maintain monthly records of Landfill gas combusted by the open flare. Records maintained shall be complete and sufficient to establish compliance with Landfill gas usage limit established in D.1.2**
- (e b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

4. The Table of Contents shall be modified to reflect the conditions that have been revised.
5. **Quarterly report form is added.**

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

Part 70 Quarterly Report

Source Name: National Serv-All Landfill
Source Address: 6231 McBeth Road, Fort Wayne, In 46809
Mailing Address: 6231 McBeth Road, Fort Wayne, In 46809
Part 70 Permit No.: T003-7675-00257
Facility: Open Flare
Parameter: Landfill gas usage
Limit: The input of landfill gas (LFG) into the flare shall be less than 2,365 million standard cubic feet per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The operation of stationary municipal solid waste landfill shall be subject to the conditions of the attached proposed Significant Source Modification No. 003-19047-00257 and Significant Permit Modification No. 003-19181-00257.

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the
Technical Support Document (TSD) for a Part 70 Significant Source
Modification and Part 70 Significant Permit Modification**

Source Background and Description

Source Name:	National Serv-All Landfill
Source Location:	6231 McBeth Road Fort Wayne Indiana 46809
County:	Allen
SIC Code:	4953
Operation Permit No.:	T003-7675-00257
Operation Permit Issuance Date:	July 12, 1999
Significant Source Modification No.:	SSM 003-19047-00257
Significant Permit Modification No.:	SPM 003-19181-00257
Permit Reviewer:	RT/EVP

On August 5, 2004, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette in Fort Wayne, Indiana, stating that National Serv-All Landfill, had applied for a Part 70 significant source modification and a Part 70 significant permit modification to replace the existing 66 MMBtu/hr open flare with one (1) 5,000 scfm (148.5 MMBtu/hr) open flare, identified as EU-3, with landfill gas usage restricted to 4,500 scfm. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the 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 August 30, 2004, OAQ received comments from National Serv-All Landfill through their environmental consultant.

The summary of the comments and related responses for the comments received from the National Serv-All Landfill representative are presented. Any changes made to the permit as a result of the following comments are shown in bold and deleted permit language is shown with a line through it. Permit changes affecting the permit's Table of Contents are also revised without replication herein.

Comments Received from National Serv-All Landfill:

MODIFIED PART 70 OPERATING PERMIT

Comment 1:

Condition B.11 (h): The applicable requirement for this condition is listed as 326 IAC 2-7-16. This rule does not require the reporting of emergencies in the Quarterly Deviation and Compliance Monitoring Report. Furthermore, Part 70 Operating permit No. T003-7675-00257 does not require a Quarterly Deviation and Compliance Monitoring Report (see Comment on Condition C19). Therefore, this condition should be removed.

Response 1:

Reporting is required to document compliance with the condition and requirements listed in this permit. The initial Part 70 permit (T003-7675-00257) did require reporting of emergencies in the Deviation and Compliance Monitoring Report, however, the frequency has been changed to Quarterly in this modification. IDEM is concurrently issuing Part 70 renewal for National Serv-All Landfill. The conditions in this modification have been updated to match with those of Part 70 renewal. This is the reason for changing the frequency of reporting to quarterly.

326 IAC 2-7-5(3) (c) gives IDEM the authority to require reports "at least" every six months. The OAQ has determined that if reporting of deviations was submitted annually or semi- annually, the possibility for a malfunction of an affected facility would not be detected soon enough and could lead to a deviation from the permit requirements. Since the primary goal of Part 70 permit is to ensure current and continuing compliance with all the applicable requirements, there is no change to the reporting frequency based on this comment.

Comment 2:

Conditions B.14 (a) and Condition C.19 (a): Part 70 Operating Permit No. T003-7675-00257 does not require a Quarterly Deviation and Compliance Monitoring Report (See Comment on Condition C.19). Therefore, all the references to Quarterly Deviation and Compliance Monitoring report should be removed from these conditions

Response 2:

Reporting is required to document compliance with the condition and requirements listed in this permit. The initial Part 70 permit (T003-7675-00257) did require reporting of emergencies in the Deviation and Compliance Monitoring Report, however, the frequency has been changed to Quarterly in this modification. IDEM is concurrently issuing Part 70 renewal for National Serv-All Landfill. The conditions in this modification have been updated to match with those of Part 70 renewal. This is the reason for changing the frequency of reporting to quarterly.

IDEM, OAQ believes that submittal of a deviation report quarterly is necessary to evaluate and ensure continuous compliance with the applicable requirements. Therefore, the Quarterly Deviation and Compliance Monitoring Report is being added to this modification. There is no change to the Conditions B.14 (a) and Condition C.19 (a) based on this comment.

Comment 3:

Condition B24: IDEM believes an explicit statement regarding credible evidence is not necessary. On Page 13 of 17 of the Addendum to the Technical Support Document for the initial Part 70 Operating Permit No. T003-7675-00257, issued July 12, 1999, IDEM state the following:

The issues regarding credible evidence can be adequately addressed during a show of compliance or noncompliance. Indiana's statutes and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

Response 3:

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. Therefore, there is no change to Condition B.24 based on the comment.

Comment 4:

Condition C.19: The applicable requirement for this condition is listed as 326 IAC 2-7-5(3) (c). This rule requires reports of required monitoring every six months, including all the instances of deviations. Because this requirement is contrary to the requirements of 326 IAC 2-7-5(3) (c), National Serv-All requests that the Quarterly Deviation and Compliance Monitoring Report be replaced with Semi-annual Compliance Monitoring report, as required in the currently approved Part 70 permit.

Response 4:

Reporting is required to document compliance with the condition and requirements listed in this permit. The initial Part 70 permit (T003-7675-00257) did require reporting of emergencies in the Deviation and Compliance Monitoring Report, however, the frequency has been changed to Quarterly in this modification. IDEM is concurrently issuing Part 70 renewal for National Serv-All Landfill. The conditions in this modification have been updated to match with those of Part 70 renewal. This is the reason for changing the frequency of reporting to quarterly.

326 IAC 2-7-5(3) (c) gives IDEM the authority to require reports "at least" every six months. The OAQ has determined that if reporting of deviations was submitted annually or semi-annually, the possibility for a malfunction of an affected facility would not be detected soon enough and could lead to a deviation from the permit requirements. Since the primary goal of Part 70 permit is to ensure current and continuing compliance with all the applicable requirements, there is no change to the reporting frequency based on this comment.

Comment 5:

Condition D.1.6 (c): The periodic Startup Shutdown Malfunction (SSM) Report required under 63.1980 (b) must be submitted within 30 days after the end of each calendar half (i.e., January 30 and July 30). Please refer to 40 CFR 63.10 (d) (5) (i). Furthermore, this portion of Condition D.1.6 (c) should be moved to the Record Keeping and Reporting Requirements of Section D.1.

National Serv-All proposes that the semi-annual gas collection and control system report required by 40 CFR 63.1980 (a) should be due every March 1 and September 1. The dates should be included to clarify the applicable requirements. Please revise this condition to include due dates.

Response 5:

Condition D.1.6 cites 40 CFR 63.1955, which are general requirements (Standards) that the National Serv-All must comply with. Therefore it is appropriate that Condition D.1.6 (c) remain under *Emission Standards and Limitations* rather than moving it to the *Record Keeping and Reporting Requirements*. 40 CFR 63.1980 (a) does not specify any dates; instead it says submit compliance reports every "6 months". Therefore, there is no change to Condition D.1.6 (c) based on the comment.

Comment 6:

Condition D.1.9 (b): This condition is a requirement of the New Source Performance Standard (NSPS) 40 CFR 60, Subpart WWW and is unrelated to the landfill gas throughput limit condition D.1.2, which is a requirement to ensure that the Prevention of Significant Deterioration (PSD) regulations are not applicable. Therefore, all references to Condition D.1.2 should be removed from this condition.

Response 6:

IDEM partially agrees with the Permittee. IDEM agrees that reference to Condition D.1.9 (b) (1) is not required to ensure compliance with PSD minor limit. However, IDEM believes that the Permittee has to install, calibrate, maintain, and operate according to the manufacturers specifications the equipment specified in 40 CFR 60.756 (c) (2) to ensure compliance with PSD minor limit. Therefore, Condition D.1.9 (b) will be changed as shown below.

D.1.9 Monitoring [40 CFR 60.756]

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

- (a) The Permittee seeking to comply with 40 CFR 60.752(b)(2)(ii)(A) for an active gas collection 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 FR 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 seeking to comply with 40CFR 60.752(b)(2)(iii) ~~and condition D.1.2~~ using an open flare shall install, calibrate, maintain, and operate according to the manufacturers 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.

Installation, calibration, maintenance, and operation according to the manufacturers specifications the equipment as specified in 40 CFR 60.756 (c) (2) (i.e., Condition D.1.9 (b) (2)) will ensure compliance with Condition D.1.2.

- (c) The Permittee seeking to install a collection system that does not meet the specifications in 40 CFR 60.759 or seeking to monitor alternative parameters to those required by 40 CFR 60.753 through 40 CFR 60.756 shall provide information satisfactory to the Office of Air Quality (OAQ) as provided in 40 CFR 60.752(b)(2)(i)(B) and (C) describing the design and operation of the collection system, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Office of Air Quality (OAQ) may specify additional appropriate monitoring procedures.

- (d) The Permittee seeking to demonstrate compliance with 40 CFR 60.755(c), 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.

Comment 7:

Conditions D.1.11 (d) and D.1.14 (a): With the exception of the reporting period, the semi-annual report required by Condition D.1.14 (a) is identical to the annual report required by Condition D.1.11 (d). National Serv-All therefore proposes that the annual reporting requirement of the condition D.1.11 (d) be removed and that Condition D.1.14 (a) be modified to state that it fulfills the annual reporting requirement of 40 CFR 60.657 (f).

Response 7:

Condition D.1.11 (d) is required by 40 CFR 60.757 (NSPS) and Condition D.1.14 (a) is required by 40 CFR 63.1980 (NESHAP). Since, both the reporting conditions are required by federal regulations (NSPS and NESHAP) these conditions cannot be modified or removed. Therefore, there is no change in the conditions D.1.11 (d) and D.1.14 (a) based on the comment.

Comment 8:

Condition D.1.16: Republic believes that maintaining records of annual landfill gas consumption is sufficient to demonstrate compliance with Condition D.1.2. Therefore, Condition D.1.16 should be removed.

Response 8:

Condition D.1.16 refers to the submittal of a quarterly summary of the information to document compliance with PSD minor limit. Quarterly Reporting is required to document compliance with the landfill gas usage limitation listed in Condition D.1.2 of the permit. There will be no changes to this condition in the final permit due to this comment.

TECHNICAL SUPPORT DOCUMENT

Comment 9:

History (Page 1 of 23): The fact that Part 70 Operating Permit Renewal application was submitted October 10, 2003 should be mentioned in order to clarify that the existing Part 70 Operating Permit has not expired.

Response 9:

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.

The history is changed as shown below:

National Serv-All Landfill, formerly known as National Serv-All Landfill/ McBeth Road Landfill was issued Part 70 operating permit T003-7675-00257 on July 12, 1999. **On October 10, 2003 the source submitted a part 70 operating permit renewal and** on April 30, 2004, National Serv-All Landfill submitted an application to OAQ to replace the 66 MMBtu per hour existing open flare with one (1) new 5,000 scfm (148.5 MMBtu/Hr) open flare, identified as EU-3, with landfill gas usage restricted to 2,365 million cubic feet per year (equivalent to 4,500 scfm).

Comment 10:

Federal Rule Applicability, Page (5 of 23): In paragraph (b), the correct CFR citation for Municipal Solid Waste Landfill National Emissions Standard for Hazardous Air Pollutants (NESHAP) is 40 CFR 63.1930-63.1990.

Response 10:

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.

The paragraph (b) is changed as shown below:

This source is subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Municipal Solid Waste Landfills (40 CFR 63.1930 - 63.1952~~90~~⁹⁰, 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.

Comment 11:

Changes Proposed (Page 8 of 23): The periodic Startup Shutdown Malfunction (SSM) Report required under 40 CFR 63.1980 (b) must be submitted within 30 days after the end of each calendar half (i.e. January 30 and July 30). Please refer to 40 CFR 63.10 (d) (5) (i). Furthermore, this portion of Condition D.1.6 (c) should be moved to the Record Keeping and reporting Requirements portion of Section D.1.

Also the Semi- Annual gas collection and control system report required by 40 CFR 63.1980 (a) should be due every March 1 and September 1. The dates should be included to clarify the applicable requirements.

Response 11:

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.1.6 cites 40 CFR 63.1955, which are general requirements (Standards) that the National Serv-All must comply with. Therefore it is appropriate that Condition D.1.6 (c) remain under *Emission Standards and Limitations* rather than moving it to the *Record Keeping and Reporting Requirements*. 40 CFR 63.1980 (a) does not specify any dates; instead it says submit compliance reports every "6 months". Therefore, there is no change to Condition D.1.6 (c) based on the comment.

Comment 12:

Changes Proposed (page 10 of 23): Condition D.1.9 (b) is a requirements of the NSPS 40 CFR 60, Subpart WWW and is unrelated to the landfill gas throughput limit of Condition D.1.2, which is a requirement to ensure that PSD regulations are not applicable. Therefore, all the references to Condition D.1.2 should be removed from the Condition D.1.9 (b).

Response 12:

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.

IDEM partially agrees with the Permittee. IDEM agrees that reference to Condition D.1.9 (b) (1) is not required to ensure compliance with PSD minor limit. However, IDEM believes that the Permittee has to install, calibrate, maintain, and operate according to the manufacturers specifications the equipment specified in 40 CFR 60.756 (c) (2) to ensure compliance with PSD minor limit. Therefore, Condition D.1.9 (b) will be changed as shown below.

The condition D.1.9 on page 10 of TSD is changed as shown below:

D.1.9 Monitoring [40 CFR 60.756]

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

- (a) The Permittee seeking to comply with 40 CFR 60.752(b)(2)(ii)(A) for an active gas collection 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 FR 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 seeking to comply with 40CFR 60.752(b)(2)(iii) ~~and condition D.1.2~~ using an open flare shall install, calibrate, maintain, and operate according to the manufacturers 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.

Installation, calibration, maintenance, and operation according to the manufacturers specifications the equipment as specified in 40 CFR 60.756 (c) (2) (i.e., Condition D.1.9 (b) (2)) will ensure compliance with Condition D.1.2.

Comment 13:

Changes Proposed (Page 17 of 23): With the exception of the reporting period, the semi-annual report required by Condition D.1.14 (a) is identical to annual report required by Condition D.1.11 (d). Republic therefore proposes that the annual reporting requirements of Condition D.1.11 (d) be removed and that the Condition D.1.14 (a) be modified to state it fulfills that annual reporting requirements of 40 CFR 60.757 (f).

Response 13:

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.1.11 (d) is required by 40 CFR 60.757 (NSPS) and Condition D.1.14 (a) is required by 40 CFR 63.1980 (NESHAP). Since, both the reporting conditions are required by federal regulations (NSPS and NESHAP) these conditions cannot be modified or removed. Therefore, there is no change in the conditions D.1.11 (d) and D.1.14 (a) based on the comment.

Comment 14:

Changes Proposed (Page 21 of 23): Republic believes that maintaining the records of the annual landfill gas consumption is sufficient to demonstrate compliance with Condition D.1.2. Therefore, Condition D.16 should be removed.

Response 14:

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.1.16 refers to the submittal of a quarterly summary of the information to document compliance with PSD minor limit. Quarterly Reporting is required to document compliance with the landfill gas usage limitation listed in Condition D.1.2 of the permit. There will be no changes to this condition in the final permit due to this comment.

APPENDIX A

Comment 15:

Appendix A (all pages): The header should be changed to reflect the correct name of the stationary source, National Serv-All Landfill.

Response 15:

The name has been changed to "National Serv-All Landfill"

Comment 16:

Appendix A (Page 1 of 5): None of the entries in the Standard Conditions, Constants and Typical Value table have a reference to footnote (d). Therefore, footnote (d) should be removed from the bottom of this table. Also, in the Fuel and equipment- Open Flare table, the entry "LFG Inlet Flo, Standard" should have a reference to the footnote (a) instead of footnote (b). Similarly, the entry "Design Flare Operating Temperature" should have a reference footnote (b) instead of footnote (c). Also, footnote (a) should state that the LFG inlet flow of 4,500 scfm is based on an annual throughput limit of 2,365 MMScf, not 972 MMScf.

Response 16:

All the references have been corrected.

Comment 17:

Appendix A (Page 2 of 5): The SO₂ emissions rate should be based on 2.26 pounds per hour, as calculate in the table, not 2.01 pounds per hour. The PM₁₀ pounds per hour calculation does not reference PM₁₀ (TSP) emission factor and has a multiplier of 10⁻⁷, instead of 10⁻⁶. Also, there are no uncontrolled emissions of NMOC and VOC from the flare, because the flare itself is a control device. The values listed as uncontrolled emissions from the flare are actually the masses NMOC and VOC entering the flare.

Response 17:

All the references have been corrected.

Comment 18:

Appendix A (Page 3 of 5): The total HAP emissions from the flare exhaust do not appear to be added up correctly. The total HAP emissions should be 4.46 pounds per hour and 19.7 tons per year. Also hydrogen chloride, misspelled as "hydogen chloride", should have footnotes (d) and (e) to indicate it is a product of combustion with a default outlet concentration. Finally, the reference (g) should be removed from ethyl benzene, as there is no footnote (g) for this table.

Response 18:

All the references have been corrected.

Comment 19:

Appendix A (Page 5 of 5): The HAP, PM₁₀, VOC, NMOC, and TSP emission calculated should be updated to reflect the comments regarding pages 1,2, and 3, of Appendix A. Also, it is unclear how the fugitive emissions of HAP, VOC, and NMOC from the landfill were calculated.

Response 19:

All the references have been corrected.

IDEM also decided to make the following changes to the proposed permit.

Revision 1:

Condition B.8 has been revised as shown below:

- 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).

Revision 2:

The source is located in Allen County and has potential emissions of CO, SO₂, NO_x less than 2,500 tons per year or PM₁₀, VOC less than 250 tons per year. Pursuant to 326 IAC 2-6-3 (b) (1), starting in 2007, the source should submit an emission statement triennially.

Condition C.17 has been revised as shown below:

- C.17 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) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~ **In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 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 criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~ **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.

Equipment Data

Company Name: National Serv-All Landfill
Address City IN Zip: 6231 McBeth Road Fort Wayne Indiana 46809
Permit No.: SPM 003-19181-00257
Reviewer: RT/EVP
Date: 06-04-04

Standard Conditions, Constants, and Typical Values

Category	Value	Equivalent
Standard Temperature ^a	60 °F	520 °R
Universal Gas Constant	0.7302 atm-ft ³ /lb-mol°R	
Pressure ^a	1 atm	
Methane Heating Value ^b	1,000 Btu/ft ³	
LFG Methane Component ^c	55%	
LFG Typical Heating Value	550 Btu/ft ³	
LFG Temperature ^c	100 °F	560 °R
LFG Moisture ^c	8%	

^aIndustrial STP (60°F, 30.00 in. Hg, 1 atm)

^bTypical

^cAssumed

^dSource: *Professional Engineering Registration Program*, pg. 23-9

Table. Fuel & Equipment - Open Flare

Open Flare Information	Value	Equivalent
LFG inlet flow, standard ^a	4,500 scfm	
LFG Inlet Flow, dry standard	4,140 dscfm	
Heat Input	148.5 MMBtu/hr	
Design Flare Operating Temperature ^b	1,400 °F	1,860 °R
Flare Tip Flow, standard	4,500 scfm	
Flare Tip Flow, actual	16,096 acfm	
Flare Tip Diameter ^b	1.0 ft	
Flare Tip Exhaust Velocity	20,505 ft/min	341.7 ft/s
Flare Tip Height, above local grade ^b	35 ft	

^aSource: Based on annual LFG throughput limit of 2,365 MM scf

^bSource: Flare manufacturer

Criteria pollutants Emissions

Company Name: National Serv-All Landfill
Address City IN Zip: 6231 McBeth Road Fort Wayne Indiana 46809
Permit No.: SPM 003-19181-00257
Reviewer: RT/EVP
Date: 06-04-04

Criteria Pollutant Emissions - Open Flare

Annual Operating Hours	8,760 Hours
LFG inlet flow, standard	4,500 scfm
Heat Input	148.5 MMBtu/hr

SO₂ Emission Rate

SO ₂ concentration in exhaust gas	49.60 ppmv	
SO ₂ emission rate	2.26 lb/hr	8.80 ton/yr
SO ₂ molecular weight	64.07	

LFG Compound	CAS	MW (lb/lb-mol)	Conc (ppmv) ^a	Control Eff b, c	No. of S Atoms	Individual Compound Contribution to SO ₂	
						S Conc (ppmv)	SO ₂ Emiss (lb/hr)
Carbon Disulfide	75-15-0	76.13	0.58	99.7%	2	1.16	0.05
Carbonyl Sulfide	463-58-1	60.07	0.49	99.7%	1	0.49	0.02
Dimethyl Sulfide (methyl sulfide)	75-18-3	62.13	7.82	99.7%	1	7.80	0.36
Ethyl Mercaptan (ethanethiol)	75-08-1	62.13	2.28	99.7%	1	2.27	0.10
Hydrogen Sulfide	7783-06-4	34.08	35.50	99.7%	1	35.39	1.61
Methyl Mercaptan	74-93-1	48.11	2.49	99.7%	1	2.48	0.11
Total Contribution to SO ₂ :						49.60	2.26

PM₁₀ Emission Rate

PM emission factor ^d	17 lb/MM dscf CH ₄	
PM emission rate	2.03 lb/hr	8.89 ton/yr

NO₂ Emission Rate

NO ₂ emission factor ^e	0.068 lb/MMBtu	
NO ₂ emission rate	10.1 lb/hr	44.2 ton/yr

CO Emission Rate

CO emission factor ^e	0.37 lb/MMBtu	
CO emission rate	54.9 lb/hr	240.7 ton/yr

NMOC Emission Rate

NMOC conc inlet gas ^f	595 ppmv	
MW hexane	86.18 lb/lb-mol	
destruction efficiency	98%	
mass NMOC inlet gas	36.5 lb/hr	159.7
NMOC emission rate	0.73 lb/hr	3.19 ton/yr

(controlled)

VOC Emission Rate

NMOC conc inlet gas ^f	595 ppmv	
VOC fraction of NMOC ^f	39%	
VOC concentration in inlet gas	232 ppmv	
MW hexane	86.18 lb/lb-mol	
mass VOC inlet gas	14.2 lb/hr	
destruction efficiency	98%	
VOC emission rate	0.28 lb/hr	1.25 ton/yr

(Controlled)

Note: References to AP-42 are taken from, US Environmental Protection Agency, *Compilation of Air Pollutant Emission Factors, Volume I. Stationary Point and Area Sources, 5th Ed.* (unless otherwise noted)

^aSource: US EPA. AP-42, Tables 2.4-1 and 2.4-3, November 1998.

^bSource: US EPA. AP-42, Table 2.4-3, November 1998.

^cAP-42 gives ranges for control efficiencies. Control efficiencies for halogenated species range from 91 to 99.7 percent. The upper end of the range is used here resulting in maximum calculated emissions of SO₂.

^dSource: US EPA. AP-42, Table 2.4-5, November 1998.

^eSource: Typical value provided by LFG Specialties Inc.

^fSource: US EPA. AP-42, Table 2.4-2, November 1998.

HAP Emissions from Open Flare

Company Name: National Serv-All Landfill
 Address City IN Zip: 6231 McBeth Road Fort Wayne Indiana 46809
 Permit No.: SPM 003-19181-00257
 Reviewer: RT/EVP
 Date: 06-04-04

LFG inlet flow

4,500 scfm

LFG Compound	HAP	VOC	CAS	MW (lb/lb-mol)	Compound Conc & Mass in Inlet Gas		Control Eff b, c	Flare Exhaust		
					(ppmv) ^a	(lb/hr)		(ton/yr)	lb/hr	ton/yr
1,1,1 - Trichloroethane (methyl chloroform)	x	--	71-55-6	133.41	0.48	0.0455353	0.1994446	91.0%	0.0040982	0.01795
1,1,2,2 - Tetrachloroethane	x	x	79-34-5	167.85	1.11	0.1324838	0.5802792	91.0%	0.0119235	0.0522251
1,1,2 - Trichloroethane (1,1,2 TCA)	x	x	79-00-5	133.41	0.10	0.0094865	0.041551	91.0%	0.0008538	0.0037396
1,1 - Dichloroethane (ethylidene dichloride)	x	x	75-34-3	98.96	2.35	0.165366	0.7243029	91.0%	0.0148829	0.0651873
1,1 - Dichloroethene (vinylidene chloride)	x	x	75-35-4	96.94	0.20	0.0138554	0.0606865	91.0%	0.001247	0.0054618
1,2 - Dichloroethane (ethylene dichloride)	x	x	107-06-2	98.96	0.41	0.02864	0.1254431	91.0%	0.0025776	0.0112899
1,2 - Dichloropropane (propylene dichloride)	x	x	78-87-5	112.99	0.18	0.0144621	0.063344	91.0%	0.0013016	0.005701
Acrylonitrile (Propenenitrile)	x	x	107-13-1	53.06	6.33	0.2388304	1.046077	38.0%	0.1480748	0.6485677
Benzene	x	x	71-43-2	78.12	1.91	0.1060997	0.4647167	38.0%	0.0657818	0.2881244
Carbon Disulfide	x	x	75-15-0	76.14	0.58	0.0315646	0.1382529	38.0%	0.01957	0.0857168
Carbon Tetrachloride	x	x	56-23-5	153.84	0.004	0.0004376	0.0019166	91.0%	3.938E-05	0.0001725
Carbonyl Sulfide	x	x	463-58-1	60.07	0.49	0.0209301	0.091674	38.0%	0.0129767	0.0568379
Chlorobenzene (monochlorobenzene)	x	x	108-90-7	112.56	0.25	0.02033	0.0890452	91.0%	0.0018297	0.0080141
Chloroethane (ethyl chloride)	x	x	75-00-3	64.52	1.25	0.0573486	0.251187	91.0%	0.0051614	0.0226068
Chloroform (trichloromethane)	x	x	67-66-3	119.38	0.03	0.0025467	0.0111544	91.0%	0.0002292	0.0010039
Chloromethane (methyl chloride)	x	x	74-87-3	50.49	1.21	0.043442	0.1902758	91.0%	0.0039098	0.0171248
1,4 Dichlorobenzene (p-dichlorobenzene)	x	x	106-46-7	147	0.21	0.0222646	0.0975191	91.0%	0.0020038	0.0087767
Dichloromethane (methylene chloride)	x	--	75-09-2	84.93	14.3	0.8636062	3.7825952	91.0%	0.0777246	0.3404336
Ethylbenzene	x	x	100-41-4	106.17	4.61	0.3480337	1.5243877	38.0%	0.2157809	0.9451204
Ethylene dibromide (1,2 dibromoethane)	x	x	106-93-4	187.88	0.001	0.0001336	0.0005852	91.0%	1.202E-05	5.266E-05
Hexane	x	x	110-54-3	86.18	6.57	0.4026155	1.7634557	38.0%	0.2496216	1.0933426
Mercury (total)	x	--	7439-97-6	200.61	0.000292	4.165E-05	0.0001824	0.0%	4.165E-05	0.0001824
Methyl Ethyl Ketone (2-butanone)	x	x	78-93-3	72.11	7.09	0.3635468	1.592335	38.0%	0.225399	0.9872477
Methyl Isobutyl Ketone (hexone)	x	x	108-10-1	100.16	1.87	0.1331848	0.5833492	38.0%	0.0825745	0.3616765
Tetrachloroethylene (perchloroethylene, -ethene)	x	x	127-18-4	165.83	3.73	0.4398357	1.9264806	91.0%	0.0395852	0.1733833
Toluene (methylbenzene)	x	x	108-88-3	92.14	39.3	2.574894	11.278036	38.0%	1.5964343	6.9923821
Trichloroethylene (trichloroethene)	x	x	79-01-6	131.38	2.82	0.2634492	1.1539077	91.0%	0.0237104	0.1038517
Vinyl Chloride (chloroethylene, VCM)	x	x	75-01-4	62.50	7.34	0.326208	1.4287912	91.0%	0.0293587	0.1285912
Xylenes (m, o, p)	x	x	1330-20-7	106.17	12.1	0.9134942	4.0011045	38.0%	0.5663664	2.4806848
Hydrogen Chloride ^{d, e}	x	--	7647-01-0	36.50	42.0	1.090086	4.7745765	0.0%	1.090086	4.7745765
Total HAP ^b						8.67	37.99		4.49	19.7
Maximum Single HAP						1.14	4.99		1.60	6.99

Note: References to AP-42 are taken from, US Environmental Protection Agency, *Compilation of Air Pollutant Emission Factors, Volume I. Stationary Point and Area Sources, 5th Ed.* (unless otherwise noted)

Key to HAP and VOC list: "x" denotes a HAP only or a HAP and VOC; "y" denotes a VOC only

^a Source: AP-42, Tables 2.4-1 and 2.4-2, November 1998.

^b Source: AP-42, Tables 2.4-3, November 1998.

^c AP-42 gives ranges for control efficiencies. Control efficiencies for halogenated species range from 91 to 99.7 percent and control efficiencies for non-halogenated species range from 38 to 91 percent. For permitting purposes, the lower end of each range is used here.

^d Product of combustion

^e Default outlet concentration; Source: US EPA. AP-42, Section 2.4.4, November 1998.

Sample Calculations

Company Name: National Serv-All Landfill
Address City IN Zip: 6231 McBeth Road Fort Wayne Indiana 46809
Permit No.: SPM 003-19181-00257
Reviewer: RT/EVP
Date: 06-04-04

Sample Calculations**Standard Conditions and Constants**

$$^{\circ}\text{R} = ^{\circ}\text{F} + 460$$

$$\text{standard temperature} = 60 \text{ }^{\circ}\text{F}$$

$$\text{standard pressure} = 1 \text{ atm}$$

$$\text{Universal gas constant (R)} = 0.7302 \text{ atm}\cdot\text{ft}^3/\text{lb}\cdot\text{mol}^{\circ}\text{R}$$

Flow

$$\text{dscfm} = \text{scfm} \cdot (1 - \% \text{moisture})$$

$$\text{acfm} = \text{scfm} \cdot (\text{actual temp}[^{\circ}\text{R}]) / (\text{standard temp}[^{\circ}\text{R}] \cdot \{(\text{standard press}[\text{atm}]) / (\text{actual press}[\text{atm}])\})$$

CO and NO_x Emissions

$$(\text{lb/MMbtu}) \cdot (\text{MMbtu/hr}) = \text{lb/hr}$$

SO₂ Emissions

typically, 86% to 99.7% of sulfur compounds convert to SO₂ during combustion

$$\{(\text{scfm}) \cdot (60 \text{ min/hr}) \cdot (\text{total sulfur concentration} [\text{ppmv}]) \cdot (1 - \text{control efficiency}) \cdot (\text{MW SO}_2)\} / \{(R) \cdot (T)\} = \text{lb/hr}$$

PM₁₀ Emissions

$$(\text{dscfm}) \cdot (\text{CH}_4 \text{ component}) \cdot (1\text{E-}6 \text{ MMscf/scf}) \cdot (\text{lb PM/MMscf CH}_4) \cdot (60 \text{ min/hr}) = \text{lb/hr}$$

VOC Emissions

$$\{(\text{scfm} \cdot 60 \text{ min/hr} \cdot \text{concentration}_{\text{compound}} [\text{ppmv}] \cdot \text{MW}_{\text{compound}})\} / \{(R) \cdot (T)\} \cdot (1 - \text{control efficiency}) = \text{lb/hr}$$

OR

VOCs are 39 percent of NMOC, as prescribed in AP-42

$$\text{VOC concentration} [\text{ppmv}] = \text{NMOC concentration} [\text{as hexane}] \cdot 39\%$$

flare and/or engines typically combust 98% of VOCs

$$\{(\text{scfm} \cdot 60 \text{ min/hr} \cdot \text{concentration}_{\text{hexane}} [\text{ppmv}] \cdot \text{MW}_{\text{hexane}})\} / \{(R) \cdot (T)\} \cdot (0.39) = \text{lb/hr}$$

LFG Compound Emissions

$$\{(\text{scfm} \cdot 60 \text{ min/hr} \cdot \text{concentration}_{\text{compound}} [\text{ppmv}] \cdot \text{MW}_{\text{compound}})\} / \{(R) \cdot (T)\} \cdot (1 - \text{control efficiency})$$

HCl Emissions

typically, 86% to 99.7% of chlorine compounds convert to HCl during combustion

(concentration_{compound} [ppm]) · (control efficiency) · (no. of chlorine atoms) = HCl concentration [ppm] in outlet gas from each compound

$$\{\text{HCl concentration}_{\text{each compound}} [\text{ppm}] \cdot \text{scfm} \cdot \text{MW}_{\text{HCl}}\} / \{(R) \cdot (T)\} \cdot (60 \text{ min/hr}) = \text{lb/hr}$$

OR

$$\{(\text{scfm}) \cdot (60 \text{ min/hr}) \cdot (\text{HCl outlet concentration per AP-42} [\text{ppmv}]) \cdot (1 - \text{control efficiency}) \cdot (\text{MW})\} / \{(R) \cdot (T)\} = \text{lb/hr}$$

Appendix A: Emission Calculations

Total emissions from Open Flare

Company Name: National Serv-All Landfill
Address City IN Zip: 6231 McBeth Road Fort Wayne Indiana 46809
Permit No.: SPM 003-19181-00257
Reviewer: RT/EVP
Date: 06-04-04

Potential Emissions Summary - Utility (Open) Flare

Emission Unit ID No.	Description	Potential Emissions (controlled)																		
		LFG Flow	NO _x		CO		SO ₂		PM ₁₀		TSP		NMOC		VOC		HAP (Total)		HAP (Single)	
		(scfm)	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
3.00	One Open Flare	4500.00	10.10	44.23	54.95	240.66	2.26	9.90	2.03	8.89	2.03	8.89	0.73	3.19	0.28	1.25	4.49	19.68	0.71	3.11

Total emissions from Entire source (Flare+Landfill+Fugitives)

Emission Unit ID No.	Description	Potential Emissions (controlled)																		
		LFG Flow	NO _x		CO		SO ₂		PM ₁₀		TSP		NMOC		VOC		HAP (Total)		HAP (Single)	
		(scfm)	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
3.00	One Open Flare	4500.00	10.10	44.23	54.95	240.66	2.26	9.90	2.03	8.89	2.03	8.89	0.73	3.19	0.28	1.25	4.49	19.68	0.71	3.11
1.00	Landfill	975.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.71	33.77	3.01	13.18	1.63	7.14	0.55	2.41
	Total		10.10	44.23	54.95	240.66	2.26	9.90	2.03	8.89	2.03	8.89	8.44	36.96	3.29	14.43	6.12	26.82	1.26	5.52