



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: January 18, 2005
RE: United Refuse Company, Inc. / 003-19478-00291
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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

January 18, 2005

Mr. Dan Magoun
Republic Services of Indiana, L.P.
832 Langsdale Avenue
Indianapolis, Indiana 46202

Re: 003-19478-00291
Minor Source Modification to:
Part 70 Operating Permit No.: T 003-9646-00291

Dear Mr. Magoun:

United Refuse Company was issued Part 70 Operating Permit T 003-9646-00291 on November 29, 2000 for a solid waste landfill. An application to modify the source was received on June 16, 2004. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (b) One (1) open flare, identified as EU-2, installed in 2005, with a maximum heat input capacity of 39.6 million British thermal units per hour and the flow rate of 1,200 standard cubic feet per minute (scfm) of landfill gas.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. 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 thereunder, 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 minor source modification authorizes construction of the new emission units. 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 contact Craig J. Friederich, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 19 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

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

Attachments
CJF/MES

cc: File - Allen County
Allen County Health Department
Air Compliance Section Inspector - Patrick Burton
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**United Refuse Company, Inc.
5000 Smith Road
Fort Wayne, Indiana 46809**

One (1) source with the National Serv-All/McBeth Road Landfill, Plant ID 003-00257

(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.

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 Minor Source Modification: 003-19478-00291	Conditions Affected: A.1, A.3, B.24, and Section D.1
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 18, 2005

TABLE OF CONTENTS

A	SOURCE SUMMARY	3
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC2-7-1(22)]	
A.2	Part 70 Source Definition [326 IAC 2-7-1(22)]	
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
B	GENERAL CONDITIONS	4
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]	
D.1	FACILITY OPERATION CONDITIONS: Landfill	5
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.1.1	General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]	
D.1.2	Municipal Solid Waste Landfill NSPS [326 IAC 12] [40 CFR 60.752, Subpart WWW]	
D.1.3	Municipal Solid Waste Landfill NESHAP [326 IAC 20] [40 CFR 63, Subpart AAAA]	
	Compliance Determination Requirements	
D.1.4	Compliance Determination [40 CFR 63.1960]	
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
D.1.5	Non Methane Organic Compound (NMOC) Rate Calculation [40 CFR 60.754]	
D.1.6	Reporting Requirements [40 CFR 60.757]	
D.1.7	Record Keeping Requirements [326 IAC 12] [40 CFR 60.758]	

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 solid waste landfill.

Responsible Official:	Dan Magoun
Responsible Official Address:	832 Langsdale Avenue, Indianapolis, Indiana 46202
Source Address:	5000 Smith Road, Fort Wayne, Indiana 46809
Mailing Address:	6231 McBeth Road, Fort Wayne, Indiana 46809
SIC Code:	4953
County Location:	Allen
Source Location Status:	Basic Nonattainment for 8-hour Ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source under PSD Rules Major Source, Section 112 of the Clean Air Act Minor Source under Nonattainment NSR
Source Status:	One (1) source with the National Serv-All/McBeth Road Landfill, Plant ID 003-00257

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

This landfill company consists of two (2) plants:

- (a) National Serv-All/McBeth Road Landfill (Plant Id 003-00257) is located at 6231 McBeth Road, Fort Wayne, Indiana 46809; and
- (b) United Refuse Landfill (Plant Id 003-00291) is located at 5000 Smith Road, Fort Wayne, Indiana 46809.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

Separate Part 70 permits will be issued to National Serv-All/McBeth Road Landfill with Permit No.: 003-7675-00257 and United Refuse Landfill with Permit No.: 003-9646-00291 for administrative purposes and to separately address the applicability of NSPS Subpart WWW.

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

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

- (a) One (1) stationary solid waste landfill, known as EU -1, with thirty two (32) passive vents, collectively identified as Stack 1, constructed in 1976 and modified to increase capacity after May 30, 1991, design capacity: 3.0 million megagrams.
- (b) One (1) open flare, identified as EU-2, installed in 2005, with a heat input capacity of 39.6 million British thermal units per hour, and a flow rate of 1,200 standard cubic feet per minute of landfill gas.

SECTION B

GENERAL CONDITIONS

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 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.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) stationary solid waste landfill, known as EU -1, with thirty two (32) passive vents, collectively identified as Stack 1, constructed in 1976 and modified to increase capacity after May 30, 1991, design capacity: 3.0 million megagrams.
- (b) One (1) open flare, identified as EU-2, installed in 2005, with a heat input capacity of 39.6 million British thermal units per hour, and a flow rate of 1,200 standard cubic feet per minute of landfill gas.

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

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

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A] and to HAPs[326 IAC 20-1-1] [40 CFR Part 63, 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 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the facility described in this section where specified by Table 1 of 40 CFR 63, Subpart AAAA.

D.1.2 Municipal Solid Waste Landfill NSPS [326 IAC 12] [40 CFR 60.752, Subpart WWW]

- (a) The municipal solid waste landfill has a design capacity greater than 2.5 million megagrams (Mg) and shall either comply with 40 CFR 60.752 (b)(2) or calculate the non methane organic compound (NMOC) emission rate for the landfill using the procedures specified in 40 CFR 60.754.
- (b) Pursuant to 40 CFR 60.752, a gas collection and control system is not required to be installed at the United Refuse Landfill. United Refuse Landfill is a separate and distinct municipal solid waste landfill for the purposes of 40 CFR Part 60 Subpart WWW applicability.

D.1.3 Municipal Solid Waste Landfill NESHAP [326 IAC 20] [40 CFR 63, Subpart AAAA]

The municipal solid waste landfill has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters (m³) and has estimated uncontrolled emissions greater than 50 megagrams per year. Therefore, this landfill shall comply with 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, recordkeeping, or reporting provisions, the Permittee must follow the procedures in 40 CFR 60.752(b)(2).

Compliance Determination Requirements

D.1.4 Compliance Determination [40 CFR 63.1960]

Pursuant to 40 CFR 63.1960, compliance with 40 CFR 63, Subpart AAAA is determined 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.

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

D.1.6 Reporting Requirements [40 CFR 60.757]

Pursuant to 40 CFR 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, a change in the operating procedures, or any other means which results in an increase in the maximum design capacity of the landfill above 2.5 million megagrams or 2.5 million cubic meters. The Permittee's initial design capacity report was submitted on June 10, 1996.
- (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 40 CFR 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) 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 40 CFR 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) 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) Pursuant to 40 CFR 63.1980, the Permittee shall submit reports as specified in 40 CFR 60, Subpart WWW with one exception: The Permittee must submit the annual report described in 40 CFR 60.757(f) every six (6) months.
- (g) A summary of the above information shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit.

D.1.7 Record Keeping Requirements [326 IAC 12] [40 CFR 60.758]

Pursuant to 40 CFR 60.758:

- (a) Except as provided in 40 CFR 60.752(b)(2)(i)(B), the Permittee subject to 40 CFR 60.752(b) shall keep for at least 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) 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.

- (c) Pursuant to 40 CFR 63.1980, the Permittee shall keep records as specified in 40 CFR 60, Subpart WWW.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Part 70 Minor Source and Significant Permit Modifications

Source Background and Description

Source Name:	United Refuse Company, Inc.
Source Location:	5000 Smith Road, Fort Wayne, Indiana 46809
County:	Allen
SIC Code:	4953
Operation Permit No.:	T 003-9646-00291
Operation Permit Issuance Date:	November 29, 2000
Minor Source Modification No.:	003-19478-00291
Significant Permit Modification No.:	003-19626-00291
Permit Reviewer:	Craig J. Friederich

The Office of Air Quality (OAQ) has reviewed a modification application from United Refuse Company, Inc. relating to the construction and operation of the following emission unit and pollution control device:

- (b) One (1) open flare, identified as EU-2, constructed in 2005, with a maximum heat input capacity of 39.6 million British thermal units per hour and the flow rate of 1,200 standard cubic feet per minute (scfm) of landfill gas.

History

On June 16, 2004, United Refuse Company, Inc. submitted an application to the OAQ requesting to add a 1,200 scfm open flare with a maximum heat input capacity of 39.6 million British thermal units per hour to their existing plant. United Refuse Company, Inc. was issued a Part 70 Operating Permit on November 29, 2000. United Refuse Company, Inc. is also requesting to re-designate the thirty-two (32) passive vents as collective stack No.1.

On January 16, 2003, the U.S. EPA promulgated National Emission Standards for Hazardous Air Pollutants (NESHAP) for landfills (40 CFR 63, Subpart AAAA). This rule applies to area source landfills with a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³) and estimated uncontrolled emissions of 50 Mg/yr NMOC or more, or sources which are collocated with major sources of HAPs. United Refuse Company is collocated with National Serv-All/McBeth Road Landfill, which is a major source of HAPs. Therefore, this NESHAP will be applicable to United Refuse Company.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
No.2	Open Flare	28.0	0.67	1,200	1,400

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor 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 June 16, 2004.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

The HAP calculations submitted by the applicant have been verified and found to be accurate and correct.

Potential To Emit of 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. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2.72
PM ₁₀	2.72
SO ₂	2.74
VOC	0.259
CO	64.2
NO _x	11.8

HAPs	Potential To Emit (tons/year)
Single HAP	1.86
Combination HAPs	5.20

*Note: HAP calculations submitted by the source have been reviewed and found to be accurate and complete.

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(3) and 326 IAC 2-7-10.5(d)(5). The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 003-19626-00291) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission unit.

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	basic nonattainment
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 all remaining 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.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	8.90
PM ₁₀	8.90
SO ₂	10.2
VOC	28.0
CO	241
NO _x	44.4

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of one-hundred (100) tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the sum of the PSD source definition emissions from the National Serv-All Landfill as contained in SSM 003-19047-00257 and the TSD for the Part 70 Operating Permit (003-9646-00291) for the United Refuse Company, Inc. landfill. Please note that since the PM and PM10 emissions from the United Refuse Landfill are fugitive, they have not been included in this PSD source definition.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Proposed Modification	2.72	2.72	2.74	0.259	64.2	11.8	5.20
Entire Source (including emissions from the National Serv-All/McBeth Road Landfill and this modification)	11.6	11.6	12.9	15.7	305	56.2	individual HAP greater than ten (10), total greater than twenty-five (25)
PSD/ Nonattainment NSR Threshold Level	250	250	250	100	250	100	-

*Note: United Refuse Company ran an updated landfill gas model and the potential to emit VOC was 4.20 tons per year. The flare is going to control 75% of the VOC emissions from the landfill. Therefore, the potential to emit will be 1.05 tons per year plus the 0.259 tons per year potential to emit from the flare, plus the 14.4 tons per year from the National Serv-All Landfill. Therefore, the adjusted PTE VOC from the entire source is 15.7 tons per year.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, the PSD requirements do not apply.

This modification to an existing minor stationary source is not major because the emission increase is less than the Nonattainment New Source Review threshold levels. Therefore, the Nonattainment New Source Review requirements do not apply.

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 with the potential to emit before controls equal to or greater than the

major source threshold for all criterial pollutants.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) This source has accepted waste since November 8, 1987, and has a design capacity greater than 2.5 million megagrams, and is collocated with a major source of HAPs. Therefore, the 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 landfill site does not include a bioreactor, as defined in 40 CFR 63.1990.

Since this NESHAP was promulgated on January 16, 2003 and was not included in the source's Title V permit (T003-9646-00291, issued November 29, 2000), the conditions for the requirement of 40 CFR 63, Subpart AAAA will be added into this source modification and permit modification. The additional conditions are listed as the following:

- (1) Pursuant to 40 CFR 63.1955, the Permittee shall:
 - (A) Comply with the requirements of 40 CFR 60, Subpart WWW. The source is already subject to, and in compliance with, the requirements of Subpart WWW.
 - (B) Pursuant to 40 CFR 63.1960, compliance is determined in the same way it is determined for 40 CFR 60, Subpart WWW.
- (2) Pursuant to 40 CFR 63.1980, the Permittee shall keep records and reports as specified in 40 CFR 60, Subpart WWW with one exception: The Permittee must submit the annual report described in 40 CFR 60.757(f) every six (6) months.

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

Pursuant to 40 CFR 60.757(b), a Tier II NMOC emission rate report was submitted on May 14, 2002. This report showed NMOC emissions of less than fifty (50) Megagrams per year through 2006. Therefore, pursuant to 40 CFR 60.752(b), a gas collection and control system is not required to be installed at the United Refuse Landfill. As a result, there are no compliance monitoring, testing, recordkeeping, or reporting requirements for the open flare. Therefore, the flare is not required to operate to comply with any specific rules. The Permittee is not required to develop and implement a written Startup, Shutdown, and Malfunction (SSM) plan according to the provisions in 40 CFR 63.6(e)(3).

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

This modification is a minor modification to an existing minor source, as indicated in the source status table above. Therefore, the requirements of 326 IAC 2-2 are not applicable. This modification will make the source a major source pursuant to 326 IAC 2-2, PSD, based on the potential to emit CO from the National Serv-All/McBeth Road landfill (241 TPY) added to the potential to emit CO from this source (64.2 TPY). Future modifications will be reviewed as modifications to an existing major

PSD source.

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.

There are no compliance monitoring requirements for the open flare. The flare is not required to operate to comply with any specific rules.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Allen County has been designated as nonattainment for the 8-hour ozone standard.

This source is a minor source of HAPs pursuant to Section 112 of the Clean Air Act. The source was erroneously designated as major in the original Part 70 Operating Permit. The error has been corrected as shown below.

This modification will make the source a major source pursuant to 326 IAC 2-2, PSD, based on the potential to emit CO from the National Serv-All Landfill (241 TPY) added to the potential to emit CO from this source (64.2 TPY). This change is shown below.

The following has been added to A.1 General Information:

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 solid waste landfill.

Responsible Official:	Dan Magoun
Responsible Official Address:	741 Summitterest Drive, Indianapolis, Indiana 46241 832 Langsdale Avenue, Indianapolis, Indiana 46202
Source Address:	5000 Smith Road, Fort Wayne, Indiana 46809
Mailing Address:	6231 McBeth Road, Fort Wayne, Indiana 46809
SIC Code:	4953
County Location:	Allen

Source Location Status: ~~Attainment for all criteria pollutants~~
Basic Nonattainment for 8-hour Ozone
Attainment for all other criteria pollutants

Source Status: Part 70 Permit Program
~~Minor~~ **Major Source** under PSD Rules
Major Source, Section 112 of the Clean Air Act
Minor Source under Nonattainment NSR

Source Status: One (1) source with the National Serv-All/McBeth Road Landfill,
Plant ID 003-00257

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

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

- (a) One (1) stationary solid waste landfill, known as EU -1, with thirty two (32) passive vents, ~~known as stacks 1 through 32,~~ **collectively identified as Stack 1** constructed in 1976 and modified to increase capacity after May 30, 1991, design capacity: 3.0 million megagrams.
- (b) **One (1) open flare, identified as EU-2, installed in 2005, with a heat input capacity of 39.6 million British thermal units per hour, and a flow rate of 1,200 standard cubic feet per minute of landfill gas.**

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

- (a) The Permittee shall pay annual fees to IDEM, **OAQ**, within thirty (30) calendar days of receipt of a billing. Pursuant 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-~~0425~~**4230** (ask for **OAQ, Technical Support and Modeling Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) stationary solid waste landfill, known as EU -1, with thirty two (32) passive vents, ~~known as stacks 1 through 32,~~ **collectively identified as Stack 1**, constructed in 1976 and modified to increase capacity after May 30, 1991, design capacity: 3.0 million megagrams.
- (b) **One (1) open flare, identified as EU-2, installed in 2005, with a heat input capacity of 39.6 million British thermal units per hour, and a flow rate of 1,200 standard cubic feet per minute of landfill gas.**

(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] **and to HAPs [326 IAC 20-1-1] [40 CFR Part 63, 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 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the facility described in this section where specified by Table 1 of 40 CFR 63, Subpart AAAA.**

D.1.3 Municipal Solid Waste Landfill NESHAP [326 IAC 20] [40 CFR 63, Subpart AAAA]

The municipal solid waste landfill has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters (m³) and has estimated uncontrolled emissions greater than 50 megagrams per year. Therefore, this landfill shall comply with 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, recordkeeping, or reporting provisions, the Permittee must follow the procedures in 40 CFR 60.752(b)(2).**

Compliance Determination Requirements

D.1.4 Compliance Determination [40 CFR 63.1960]

Pursuant to 40 CFR 63.1960, compliance with 40 CFR 63, Subpart AAAA is determined 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.

D.1.46 Reporting Requirements [40 CFR 60.757]

- (f) **Pursuant to 40 CFR 63.1980, the Permittee shall submit reports as specified in 40 CFR 60, Subpart WWW with one exception: The Permittee must submit the annual report described in 40 CFR 60.757(f) every six (6) months.**
- (fg) A summary of the above information shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit.

D.1.57 Record Keeping Requirements [326 IAC 12] [40 CFR 60.758]

- (c) **Pursuant to 40 CFR 63.1980, the Permittee shall keep records as specified in 40 CFR 60, Subpart WWW.**
- (ed) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Please note all references to the "Office of Air Management" and "OAM" have been updated to "Office of Air Quality" and "OAQ".

Conclusion

United Refuse Company, Inc.
Ft. Wayne, Indiana
Permit Reviewer: CJF/MES

Page 9 of 9
Minor Source Modification: 003-19478-00291
Significant Permit Modification: 003-19626-00291

The construction and operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification 003-19478-00291 and Significant Permit Modification 003-19626-00291.

**Appendix A: Emission Calculations
Landfill Gas Combustion**

From the 1,200 scfm flare

**Company Name: United Refuse Company, Inc.
Address City IN Zip: 5000 Smith Road, Fort Wayne, IN 46809
MSM: 003-19478-00291
Reviewer: Craig J. Friederich
Application Date: June 16, 2004**

Fuel Input
MMBtu/hr

Flow Rate
scfm

39.6

1200

Emission Factor in lb/MMBtu	Pollutant					
	PM ^a 17.0 (lbs/MMCF)	PM10 ^a 17.0 (lbs/MMCF)	SO ₂ 49.6 ^c (ppmv)	NOx ^b 0.07 (lbs/MMBtu)	VOC ^d 595.00 (ppmv)	CO ^b 0.37 (lbs/MMBtu)
Potential Emission in tons/yr	2.72	2.72	2.74	11.8	0.259	64.18

^a Emission Factors are from AP-42, Chapter 2.4, Table 2.4-5- Emission Rates from Flares
Assume PM emissions equal to PM10 emissions.

^b Emission Factors are from AP-42, Chapter 13.5 - Industrial Flares, Table 13.5-1 (AP-42, 01/95)

^c The total inlet concentration of Sulfur/Chloride content compounds in exhaust gas

^d Emission Factors are from AP-42, chapter 2.4, table 2.4-2

Note: The flow rate was converted from scfm to dscf to calculate the potential to emit PM and PM10.

Methodology

PM/PM10 Emissions (tons/yr) = Flow Rate (dscf) x 60 (min/hr) x 17.0 (lbs) / 1,000,000 (Ft/MMCF) x 8760 (hr/yr) x 1 ton/2000 lbs

SO₂ Emissions (tons/yr) = Flow Rate (scfm) x Emission Factor (ppmv) /1000,000 x 1 atm / Gas Constant (0.7032 atm-cf/lb mole-R) / Temp (60F+ 460)
x Mole weight of SO₂ (64 lbs/lbs mole) x 60 min/hr x 8760 hr/yr x 1 ton/2000 lbs

NOx/CO Emissions (tons/yr) = Max. Heat Input (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hr/yr x 1 ton/2000 lbs

VOC Emissions (tons/yr) = Flow Rate (scfm) x Emission Factor (ppmv) /1000,000 x 1 atm / Gas Constant (0.7032 atm-cf/lb mole-R) / Temp (60F+ 460)
x Mole weight of Hexane/HCl (lbs/lbs mole) x 60 min/hr x 8760 hr/yr x 1 ton/2000 lbs x 75% collection efficiency x (1-98% control efficiency)