City of Indianapolis DPW Department of Public Works
Bart Peterson, Mayor

TO: Interested Parties / Applicant

RE: Heritage Environmental Services, LLC / 097-22634-00122

FROM: Felicia A. Robinson
Administrator

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 fifteen (15) calendar days of the receipt 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

City of Indianapolis
DPW
Department of Public Works
Bart Peterson, Mayor

NEW SOURCE REVIEW
AND Minor Source Operating Permit
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AND OFFICE OF ENVIRONMENTAL SERVICES

Heritage Environmental Services, LLC
7901 West Morris Street
Indianapolis, Indiana 46231

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 MSOP under 326 IAC 2-6.1.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: 097-22634-00122	
Issued by: Original Signed by Felicia A Robinson, Administrator Indianapolis Office of Environmental Services	Issuance Date: January 17, 2007 Expiration Date: January 17, 2012

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

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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) and Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary waste treatment and disposal facility.

Authorized Individual:	Project Engineer
Source Address:	7901 West Morris Street, Indianapolis, IN 46231
Mailing Address:	7901 West Morris Street, Indianapolis, IN 46231
General Source Phone Number:	(317) 486-2778
SIC Code:	4953
County Location:	Marion
Source Location Status:	Nonattainment for PM 2.5 and Ozone under 8-hour standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act and not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) Aqueous wastewater treatment operations, identified as 001, installed in 1999, with NO_x emissions controlled by a Packed Bed Scrubber, with a maximum capacity of 12,000 cubic feet per minute (cfm), exhausting to stack 1.

(b) Silo storage and pneumatic handling of lime, installed in 1989, identified as 002 through 006, controlled by five (5) Pulse Jet Baghouses for PM control, and one (1) back-up pulse jet baghouse, identified as 013, installed in 1993, each with a grain loading of 0.03 grains per standard cubic foot (gr/dscf), and a maximum throughput of 14,000 tons per year, and exhausting to stacks 2 through 6.

(c) One (1) natural gas fired boiler, identified as 007, installed in 1978, with a maximum capacity of 8.4 million Btu per hour (MMBtu/hr), and exhausting to stack 7.

(d) One (1) natural gas fired boiler, identified as 008, installed in 1994, with a maximum capacity of 8.4 million Btu per hour (MMBtu/hr), and exhausting to stack 8.

(e) One (1) natural gas fired CDU hot oil heater, identified as 009, installed in 1984, with a maximum capacity of 5.8 million Btu per hour (MMBtu/hr), and exhausting to stack 9.

(f) One (1) polishing building, identified as 010, installed in 1989, with an air flow rate of 400 cubic feet per minute (cfm), using a packed bed scrubber as control for NO_x, and exhausting to stack 10.

(g) One (1) natural gas fired oil processing/secondary oxidation chamber, identified as 011, with a maximum capacity of 2400 gallons per hour (gal/hr) and 4.1 million Btu per hour (MMBtu/hr), and exhausting to stack 11.

(h) One (1) natural gas fired hot water heater, identified as 012, installed in 1984, with a maximum capacity of 2.0 million Btu per hour (MMBtu/hr), and exhausting to stack 12.

(i) One (1) containment building, identified as 015, installed in 2002, with a grain loading of 0.01 grains per standard cubic foot (gr/dscf), using a pulse jet baghouse for PM control, and exhausting to stack 15.

(j) One (1) natural gas fired furnace, identified as 018, installed in 2000, with a maximum capacity of 0.5 million Btu per hour (MMBtu/hr).

(k) One (1) parts washer, identified as 019, with a maximum capacity of one (1) gallon per day.

(l) Supplemental fuel tanks, identified as 020, installed in 1978, with a maximum capacity of 7500 gallons per hour.

(m) Supplemental fuel tank loading operations, identified as 021, installed in 1978, with a maximum capacity of 7500 gallons per hour.

(n) Oil product tanks, identified as 022, installed in 1978, with a maximum capacity of 5100 gallons per hour.

(o) Oil tanker loading operations, identified as 023, installed in 1978, with a maximum capacity of 5100 gallons per hour.

(p) One (1) natural gas fired truck boiler, identified as 024, installed in 1984, with a maximum capacity of 2.0 million Btu per hour (MMBtu/hr), and exhausting to stack 24.

(q) QC Lab Hoods, identified as 025, installed in 1978, with an air flow rate of 200 cubic feet per minute (cfm), and exhausting to stack 25.

(r) One (1) de-pack air handling system, identified as 026, installed in 1978, with an air flow rate of 300 cubic feet per minute (cfm), and exhausting to stack 26.

(s) One (1) empty paint-can crusher, identified as 027, installed in 1994, with a maximum capacity of 100 cans per hour.

(t) One (1) vial shredder, identified as 028, installed in 1994, with a maximum capacity of 100 vials per hour.

(u) Two (2) lean water tank, identified as 029, installed in 1978, with a maximum capacity of 3000 gallons per hour.

(v) One (1) containment building, identified as 030, installed in 2006, with a grain loading of 0.01 grains per standard cubic foot (gr/dscf), using a pulse jet baghouse for PM control, and exhausting to stack 30

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, 097-22634-00122, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ and OES, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) and/or OES to this permit.

B.4 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.5 Enforceability

(a) 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 and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

B.6 Severability

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.7 Property Rights or Exclusive Privilege

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

B.8 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ and OES, within a reasonable time, any information that IDEM, OAQ and OES 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES 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.9 Certification

(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 an "authorized individual" 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) an "Authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

(c) The notification 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 and OES on or before the date it is due.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A copy of the PMPs shall be submitted to IDEM, OAQ and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and OES. IDEM, OAQ and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to 097-22634-00122 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326

IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

(b) A timely renewal application is one that is:

(1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ and OES 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 and OES any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]

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, and OES or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted 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, at reasonable times, 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, at reasonable times, 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,at reasonable times, 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.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 317-327-2234 (ask for OES, Air Compliance), to determine the appropriate permit fee.

B.20 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, and OES the fact that continuance of this permit is not consistent with purposes of this article.

C.3 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 thirty percent (30%) 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.4 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).

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-6.1-5(a)(2)]

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

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES 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.7 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 2-6.1-5(a)(2)]

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 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.10 Instrument Specifications [326 IAC 2-1.1-11]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements[326 IAC 2-6.1-5]

(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 or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES 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.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

(b) 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, and OES on or before the date it is due.

(c) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Combustion Activities

(c) One (1) natural gas boiler, identified as 007, installed in 1978, with a maximum capacity of 8.4 million Btu per hour (MMBtu/hr), and exhausting to stack 7.

(d) One (1) natural gas boiler, identified as 008, installed in 1994, with a maximum capacity of 8.4 million Btu per hour (MMBtu/hr), and exhausting to stack 8.

(e) One (1) CDU hot oil heater, identified as 009, installed in 1984, with a maximum capacity of 5.8 million Btu per hour (MMBtu/hr), and exhausting to stack 9.

(g) One (1) oil processing/secondary oxidation chamber, identified as 011, with a maximum capacity of 2400 gallons per hour (gal/hr)/4.1 million Btu per hour (MMBtu/hr), and exhausting to stack 11.

(h) One (1) hot water heater, identified as 012, installed in 1984, with a maximum capacity of 2.0 million Btu per hour (MMBtu/hr), and exhausting to stack 12.

(j) One (1) furnace, identified as 018, installed in 2000, with a maximum capacity of 0.5 million Btu per hour (MMBtu/hr).

(p) One (1) truck boiler, identified as 024, installed in 1984, with a maximum capacity of 2.0 million Btu per hour (MMBtu/hr), and exhausting to stack 24.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-2]

(a) Pursuant to 326 IAC 6-2-2 (Particulate Emissions Limitations for Sources of Indirect Heating), particulate emissions from indirect heating facility, 007, shall not exceed 0.6 pounds per million Btu (lbs/MMBtu).

(b) Emission units 008, 009, 011, 012, 018 and 024 are subject to the provisions of 326 IAC 6-2-4 because they are sources of indirect heat and are located in Marion County and were constructed after September 21, 1983. Particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q =Total maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

The limitation for emission units 009, 011, 012 and 024 constructed in 1984 is 0.55 pounds per million Btu (lbs/MMBtu). The limitation for emission unit 008 constructed in 1994 is 0.49 lbs/MMBtu. The limitation for emission unit 018 constructed in 2000 is 0.48 lbs/MMBtu.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Degreasing Activity

(k) One (1) parts washer, identified as 019, with a maximum capacity of one (1) gallon per day.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations existing as of January 1, 1980 located in Marion County, the Permittee shall:

(1) Equip the cleaner with a cover;
(2) Equip the cleaner with a facility for draining cleaned parts;
(3) Close the degreaser cover whenever parts are not being handled in the cleaner;
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(5) Provide a permanent, conspicuous label summarizing the operation requirements;
(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Waste Treatment Activities

(a) Aqueous wastewater treatment operations, identified as 001, installed in 1999, with NO_x emissions controlled by a Packed Bed Scrubber, with a maximum capacity of 12,000 cubic feet per minute (cfm), exhausting to stack 1.

(b) Silo storage and pneumatic handling of lime, installed in 1989, identified as 002 through 006, controlled by five (5) Pulse Jet Baghouses for PM control, and one (1) back-up pulse jet baghouse, identified as 013, installed in 1993, each with a grain loading of 0.03 grains per standard cubic foot (gr/dscf), and a maximum throughput of 14,000 tons per year, and exhausting to stacks 2 through 6.

(f) One (1) polishing building, identified as 010, installed in 1989, with an air flow rate of 400 cubic feet per minute (cfm), using a packed bed scrubber as control for NO_x, and exhausting to stack 10.

(i) One (1) containment building, identified as 015, installed in 2002, with a grain loading of 0.01 grains per standard cubic foot (gr/dscf), using a pulse jet baghouse for PM control, and exhausting to stack 15.

(l) Supplemental fuel tanks, identified as 020, installed in 1978, with a maximum capacity of 7500 gallons per hour.

(m) Supplemental fuel tank loading operations, identified as 021, installed in 1978, with a maximum capacity of 7500 gallons per hour.

(n) Oil product tanks, identified as 022, installed in 1978, with a maximum capacity of 5100 gallons per hour.

(o) Oil tanker loading operations, identified as 023, installed in 1978, with a maximum capacity of 5100 gallons per hour

(q) QC Lab Hoods, identified as 025, installed in 1978, with an air flow rate of 200 cubic feet per minute (cfm), and exhausting to stack 25.

(r) One (1) de-pack air handling system, identified as 026, installed in 1978, with an air flow rate of 300 cubic feet per minute (cfm), and exhausting to stack 26.

(s) One (1) empty paint-can crusher, identified as 027, installed in 1994, with a maximum capacity of 100 cans per hour.

(t) One (1) vial shredder, identified as 028, installed in 1994, with a maximum capacity of 100 vials per hour.

(u) Two (2) lean water tank, identified as 029, installed in 1978, with a maximum capacity of 3000 gallons per hour.

(v) One (1) containment building, identified as 030, installed in 2006, with a grain loading of 0.01 grains per standard cubic foot (gr/dscf), using a pulse jet baghouse for PM control, and exhausting to stack 30.

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

These units are subject to the requirements of NESHAP 40 CFR 61, Subpart FF as specified in Section E.

SECTION E NESHAP REQUIREMENTS

Emission Unit Description: Entire Source

This section applies to all benzene containing hazardous waste from this source.

Heritage has a total annual benzene quantity from facility waste of less than 10 megagrams per year (11 tons per year).

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

E.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 61 [326 IAC 14-1] [40 CFR Part 61, Subpart A]

(a) Pursuant to 40 CFR 61.340, the Permittee shall comply with the provisions of 40 CFR Part 61 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 14-1 for the waste treatment and disposal operation as specified in Appendix A of 40 CFR Part 61, Subpart FF.

(b) Pursuant to 40 CFR 61.09, the Permittee shall submit all required notifications and reports to:

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

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

E.2 National Emission Standards for Hazardous Air Pollutants for Benzene Waste Operations [40 CFR Part 61, Subpart FF]

Pursuant to 40 CFR Part 61, Subpart FF, the Permittee shall comply with the provisions of 40 CFR Part 61, Subpart FF, for the waste treatment and disposal operation as specified as follows.

§ 61.340 Applicability.

(a) The provisions of this subpart apply to owners and operators of chemical manufacturing plants, coke by-product recovery plants, and petroleum refineries.

(b) The provisions of this subpart apply to owners and operators of hazardous waste treatment, storage, and disposal facilities that treat, store, or dispose of hazardous waste generated by any facility listed in paragraph (a) of this section. The waste streams at hazardous waste treatment, storage, and disposal facilities subject to the provisions of this subpart are the benzene-containing hazardous waste from any facility listed in paragraph (a) of this section. A hazardous waste treatment, storage, and disposal facility is a facility that must obtain a hazardous waste management permit under subtitle C of the Solid Waste Disposal Act.

§ 61.341 Definitions.

Benzene concentration means the fraction by weight of benzene in a waste as determined in accordance with the procedures specified in §61.355 of this subpart.

Car-seal means a seal that is placed on a device that is used to change the position of a valve (e.g., from opened to closed) in such a way that the position of the valve cannot be changed without breaking the seal.

Chemical manufacturing plant means any facility engaged in the production of chemicals by chemical, thermal, physical, or biological processes for use as a product, co-product, by-product, or intermediate including but not limited to industrial organic chemicals, organic pesticide products, pharmaceutical preparations, paint and allied products, fertilizers, and agricultural chemicals. Examples of chemical manufacturing plants include facilities at which process units are operated to produce one or more of the following chemicals: benzenesulfonic acid, benzene, chlorobenzene, cumene, cyclohexane, ethylene, ethylbenzene, hydroquinone, linear alklylbenzene, nitrobenzene, resorcinol, sulfolane, or styrene.

Closed-vent system means a system that is not open to the atmosphere and is composed of piping, ductwork, connections, and, if necessary, flow inducing devices that transport gas or vapor from an emission source to a control device.

Coke by-product recovery plant means any facility designed and operated for the separation and recovery of coal tar derivatives (by-products) evolved from coal during the coking process of a coke oven battery.
Container means any portable waste management unit in which a material is stored, transported, treated, or otherwise handled. Examples of containers are drums, barrels, tank trucks, barges, dumpsters, tank cars, dump trucks, and ships.

Control device means an enclosed combustion device, vapor recovery system, or flare.

Cover means a device or system which is placed on or over a waste placed in a waste management unit so that the entire waste surface area is enclosed and sealed to minimize air emissions. A cover may have openings necessary for operation, inspection, and maintenance of the waste management unit such as access hatches, sampling ports, and gauge wells provided that each opening is closed and sealed when not in use. Example of covers include a fixed roof installed on a tank, a lid installed on a container, and an air-supported enclosure installed over a waste management unit.

External floating roof means a pontoon-type or double-deck type cover with certain rim sealing mechanisms that rests on the liquid surface in a waste management unit with no fixed roof.

Facility means all process units and product tanks that generate waste within a stationary source, and all waste management units that are used for waste treatment, storage, or disposal within a stationary source.

Fixed roof means a cover that is mounted on a waste management unit in a stationary manner and that does not move with fluctuations in liquid level.

Floating roof means a cover with certain rim sealing mechanisms consisting of a double deck, pontoon single deck, internal floating cover or covered floating roof, which rests upon and is supported by the liquid being contained, and is equipped with a closure seal or seals to close the space between the roof edge and unit wall.

Flow indicator means a device which indicates whether gas flow is present in a line or vent system.

Fuel gas system means the offsite and onsite piping and control system that gathers gaseous streams generated by facility operations, may blend them with sources of gas, if available, and transports the blended gaseous fuel at suitable pressures for use as fuel in heaters, furnaces, boilers, incinerators, gas turbines, and other combustion devices located within or outside the facility. The fuel is piped directly to each individual combustion device, and the system typically operates at pressures over atmospheric.
Individual drain system means the system used to convey waste from a process unit, product storage tank, or waste management unit to a waste management unit. The term includes all process drains and

common junction boxes, together with their associated sewer lines and other junction boxes, down to the receiving waste management unit.

Internal floating roof means a cover that rests or floats on the liquid surface inside a waste management unit that has a fixed roof.

Liquid-mounted seal means a foam or liquid-filled primary seal mounted in contact with the liquid between the waste management unit wall and the floating roof continuously around the circumference.

Loading means the introduction of waste into a waste management unit but not necessarily to complete capacity (also referred to as filling).

Maximum organic vapor pressure means the equilibrium partial pressure exerted by the waste at the temperature equal to the highest calendar-month average of the waste storage temperature for waste stored above or below the ambient temperature or at the local maximum monthly average temperature as reported by the National Weather Service for waste stored at the ambient temperature, as determined:

(1) In accordance with §60.17(c); or

(2) As obtained from standard reference texts; or

(3) In accordance with §60.17(a)(37); or

(4) Any other method approved by the Administrator.

No detectable emissions means less than 500 parts per million by volume (ppmv) above background levels, as measured by a detection instrument reading in accordance with the procedures specified in §61.355(h) of this subpart.

Oil-water separator means a waste management unit, generally a tank or surface impoundment, used to separate oil from water. An oil-water separator consists of not only the separation unit but also the forebay and other separator basins, skimmers, weirs, grit chambers, sludge hoppers, and bar screens that are located directly after the individual drain system and prior to additional treatment units such as an air flotation unit, clarifier, or biological treatment unit. Examples of an oil-water separator incude an API separator, parallel-plate interceptor, and corrugated-plate interceptor with the associated ancillary equipment.

Petroleum refinery means any facility engaged in producing gasoline, kerosene, distillate fuel oils, residual fuel oils, lubricants, or other products through the distillation of petroleum, or through the redistillation, cracking, or reforming of unfinished petroleum derivatives.

Petroleum means the crude oil removed from the earth and the oils derived from tar sands, shale, and coal.

Point of waste generation means the location where the waste stream exits the process unit component or storage tank prior to handling or treatment in an operation that is not an integral part of the production process, or in the case of waste management units that generate new wastes after treatment, the location where the waste stream exits the waste management unit component.

Process unit means equipment assembled and connected by pipes or ducts to produce intermediate or final products. A process unit can be operated independently if supplied with sufficient fuel or raw materials and sufficient product storage facilities.

Process unit turnaround means the shutting down of the operations of a process unit, the purging of the contents of the process unit, the maintenance or repair work, followed by restarting of the process.

Process unit turnaround waste means a waste that is generated as a result of a process unit turnaround.

Process wastewater means water which comes in contact with benzene during manufacturing or processing operations conducted within a process unit. Process wastewater is not organic wastes,

process fluids, product tank drawdown, cooling tower blowdown, steam trap condensate, or landfill leachate.

Process wastewater stream means a waste stream that contains only process wastewater.

Product tank means a stationary unit that is designed to contain an accumulation of materials that are fed to or produced by a process unit, and is constructed primarily of non-earthen materials (e.g., wood, concrete, steel, plastic) which provide structural support.

Product tank drawdown means any material or mixture of materials discharged from a product tank for the purpose of removing water or other contaminants from the product tank.

Safety device means a closure device such as a pressure relief valve, frangible disc, fusible plug, or any other type of device which functions exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere during unsafe conditions resulting from an unplanned, accidental, or emergency event. For the purpose of this subpart, a safety device is not used for routine venting of gases or vapors from the vapor headspace underneath a cover such as during filling of the unit or to adjust the pressure in this vapor headspace in response to normal daily diurnal ambient temperature fluctuations. A safety device is designed to remain in a closed position during normal operations and open only when the internal pressure, or another relevant parameter, exceeds the device threshold setting applicable to the air emission control equipment as determined by the owner or operator based on manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, ignitable, explosive, reactive, or hazardous materials.

Segregated stormwater sewer system means a drain and collection system designed and operated for the sole purpose of collecting rainfall runoff at a facility, and which is segregated from all other individual drain systems.

Sewer line means a lateral, trunk line, branch line, or other enclosed conduit used to convey waste to a downstream waste management unit.

Slop oil means the floating oil and solids that accumulate on the surface of an oil-water separator.
Sour water stream means a stream that:

(1) Contains ammonia or sulfur compounds (usually hydrogen sulfide) at concentrations of 10 ppm by weight or more;

(2) Is generated from separation of water from a feed stock, intermediate, or product that contained ammonia or sulfur compounds; and

(3) Requires treatment to remove the ammonia or sulfur compounds.

Sour water stripper means a unit that:

(1) Is designed and operated to remove ammonia or sulfur compounds (usually hydrogen sulfide) from sour water streams;

(2) Has the sour water streams transferred to the stripper through hard piping or other enclosed system; and

(3) Is operated in such a manner that the offgases are sent to a sulfur recovery unit, processing unit, incinerator, flare, or other combustion device.

Surface impoundment means a waste management unit which is a natural topographic depression, man-made excavation, or diked area formed primarily of earthen materials (although it may be lined with man-made materials), which is designed to hold an accumulation of liquid wastes or waste containing free liquids, and which is not an injection well. Examples of surface impoundments are holding, storage, settling, and aeration pits, ponds, and lagoons.

Tank means a stationary waste management unit that is designed to contain an accumulation of waste and is constructed primarily of nonearthen materials (e.g., wood, concrete, steel, plastic) which provide structural support.

Treatment process means a stream stripping unit, thin-film evaporation unit, waste incinerator, or any other process used to comply with §61.348 of this subpart.

Vapor-mounted seal means a foam-filled primary seal mounted continuously around the perimeter of a waste management unit so there is an annular vapor space underneath the seal. The annular vapor space is bounded by the bottom of the primary seal, the unit wall, the liquid surface, and the floating roof.

Waste means any material resulting from industrial, commercial, mining or agricultural operations, or from community activities that is discarded or is being accumulated, stored, or physically, chemically, thermally, or biologically treated prior to being discarded, recycled, or discharged.

Waste management unit means a piece of equipment, structure, or transport mechanism used in handling, storage, treatment, or disposal of waste. Examples of a waste management unit include a tank, surface impoundment, container, oil-water separator, individual drain system, steam stripping unit, thin-film evaporation unit, waste incinerator, and landfill.

Waste stream means the waste generated by a particular process unit, product tank, or waste management unit. The characteristics of the waste stream (e.g., flow rate, benzene concentration, water content) are determined at the point of waste generation. Examples of a waste stream include process wastewater, product tank drawdown, sludge and slop oil removed from waste management units, and landfill leachate.

Wastewater treatment system means any component, piece of equipment, or installation that receives, manages, or treats process wastewater, product tank drawdown, or landfill leachate prior to direct or indirect discharge in accordance with the National Pollutant Discharge Elimination System permit regulations under 40 CFR part 122. These systems typically include individual drain systems, oil-water separators, air flotation units, equalization tanks, and biological treatment units.

Water seal controls means a seal pot, p-leg trap, or other type of trap filled with water (e.g., flooded sewers that maintain water levels adequate to prevent air flow through the system) that creates a water barrier between the sewer line and the atmosphere. The water level of the seal must be maintained in the vertical leg of a drain in order to be considered a water seal.

§ 61.342 Standards: General.

(a) An owner or operator of a facility at which the total annual benzene quantity from facility waste is less than 10 megagrams per year (Mg/yr) (11 ton/yr) shall be exempt from the requirements of paragraphs (b) and (c) of this section. The total annual benzene quantity from facility waste is the sum of the annual benzene quantity for each waste stream at the facility that has a flow-weighted annual average water content greater than 10 percent or that is mixed with water, or other wastes, at any time and the mixture has an annual average water content greater than 10 percent. The benzene quantity in a waste stream is to be counted only once without multiple counting if other waste streams are mixed with or generated from the original waste stream. Other specific requirements for calculating the total annual benzene waste quantity are as follows:

(1) Wastes that are exempted from control under §§61.342(c)(2) and 61.342(c)(3) are included in the calculation of the total annual benzene quantity if they have an annual average water content greater than 10 percent, or if they are mixed with water or other wastes at any time and the mixture has an annual average water content greater than 10 percent.

(2) The benzene in a material subject to this subpart that is sold is included in the calculation of the total annual benzene quantity if the material has an annual average water content greater than 10 percent.

(3) Benzene in wastes generated by remediation activities conducted at the facility, such as the excavation of contaminated soil, pumping and treatment of groundwater, and the recovery of product from soil or groundwater, are not included in the calculation of total annual benzene quantity for that facility. If the

facility's total annual benzene quantity is 10 Mg/yr (11 ton/yr) or more, wastes generated by remediation activities are subject to the requirements of paragraphs (c) through (h) of this section. If the facility is managing remediation waste generated offsite, the benzene in this waste shall be included in the calculation of total annual benzene quantity in facility waste, if the waste streams have an annual average water content greater than 10 percent, or if they are mixed with water or other wastes at any time and the mixture has an annual average water content greater than 10 percent.

(4) The total annual benzene quantity is determined based upon the quantity of benzene in the waste before any waste treatment occurs to remove the benzene except as specified in §61.355(c)(1)(i) (A) through (C).

(f) Rather than treating the waste onsite, an owner or operator may elect to comply with paragraph (c)(1)(i) of this section by transferring the waste offsite to another facility where the waste is treated in accordance with the requirements of paragraph (c)(1)(i) of this section. The owner or operator transferring the waste shall:

(1) Comply with the standards specified in §§61.343 through 61.347 of this subpart for each waste management unit that receives or manages the waste prior to shipment of the waste offsite.

(2) Include with each offsite waste shipment a notice stating that the waste contains benzene which is required to be managed and treated in accordance with the provisions of this subpart

§ 61.355 Test methods, procedures, and compliance provisions.

(a) An owner or operator shall determine the total annual benzene quantity from facility waste by the following procedure:

(1) For each waste stream subject to this subpart having a flow-weighted annual average water content greater than 10 percent water, on a volume basis as total water, or is mixed with water or other wastes at any time and the resulting mixture has an annual average water content greater than 10 percent as specified in §61.342(a), the owner or operator shall:

(i) Determine the annual waste quantity for each waste stream using the procedures specified in paragraph (b) of this section.

(ii) Determine the flow-weighted annual average benzene concentration for each waste stream using the procedures specified in paragraph (c) of this section.

(iii) Calculate the annual benzene quantity for each waste stream by multiplying the annual waste quantity of the waste stream times the flow-weighted annual average benzene concentration.

(2) Total annual benzene quantity from facility waste is calculated by adding together the annual benzene quantity for each waste stream generated during the year and the annual benzene quantity for each process unit turnaround waste annualized according to paragraph (b)(4) of this section.

(5) If the total annual benzene quantity from facility waste is less than 1 Mg/yr (1.1 ton/yr), then the owner or operator shall:

(i) Comply with the recordkeeping requirements of §61.356 and reporting requirements of §61.357 of this subpart; and

(ii) Repeat the determination of total annual benzene quantity from facility waste whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more

(b) For purposes of the calculation required by paragraph (a) of this section, an owner or operator shall determine the annual waste quantity at the point of waste generation, unless otherwise provided in paragraphs (b) (1), (2), (3), and (4) of this section, by one of the methods given in paragraphs (b) (5) through (7) of this section.

(3) The determination of annual waste quantity for wastes that are received at hazardous waste treatment, storage, or disposal facilities from offsite shall be made at the point where the waste enters the hazardous waste treatment, storage, or disposal facility.

(c) For the purposes of the calculation required by §§61.355(a) of this subpart, an owner or operator shall determine the flow-weighted annual average ben- zene concentration in a manner that meets the requirements given in paragraph (c)(1) of this section using either of the methods given in paragraphs (c)(2) and (c)(3) of this section.

(1) The determination of flow-weighted annual average benzene concentration shall meet all of the following criteria:

(i) The determination shall be made at the point of waste generation except for the specific cases given in paragraphs (c)(1)(i)(A) through (D) of this section.

(C) The determination for wastes that are received from offsite shall be made at the point where the waste enters the hazardous waste treatment, storage, or disposal facility.

(ii) Volatilization of the benzene by exposure to air shall not be used in the determination to reduce the benzene concentration.

(iii) Mixing or diluting the waste stream with other wastes or other materials shall not be used in the determination—to reduce the benzene concentration.

(2) *Knowledge of the waste.* The owner or operator shall provide sufficient information to document the flow-weighted annual average benzene concentration of each waste stream. Examples of information that could constitute knowledge include material balances, records of chemicals purchases, or previous test results provided the results are still relevant to the current waste stream conditions. If test data are used, then the owner or operator shall provide documentation describing the testing protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the flow-weighted annual average benzene concentration for the waste stream. When an owner or operator and the Administrator do not agree on determinations of the flow-weighted annual average benzene concentration based on knowledge of the waste, the procedures under paragraph (c)(3) of this section shall be used to resolve the disagreement.

(3) Measurements of the benzene concentration in the waste stream in accordance with the following procedures:

(i) Collect a minimum of three representative samples from each waste stream. Where feasible, samples shall be taken from an enclosed pipe prior to the waste being exposed to the atmosphere.

(ii) For waste in enclosed pipes, the following procedures shall be used:

(A) Samples shall be collected prior to the waste being exposed to the atmosphere in order to minimize the loss of benzene prior to sampling.

(B) A static mixer shall be installed in the process line or in a by-pass line unless the owner or operator demonstrates that installation of a static mixer in the line is not necessary to accurately determine the benzene concentration of the waste stream.

(C) The sampling tap shall be located within two pipe diameters of the static mixer outlet.

(D) Prior to the initiation of sampling, sample lines and cooling coil shall be purged with at least four volumes of waste.

(E) After purging, the sample flow shall be directed to a sample container and the tip of the sampling tube shall be kept below the surface of the waste during sampling to minimize contact with the atmosphere.

(F) Samples shall be collected at a flow rate such that the cooling coil is able to maintain a waste temperature less than 10 °C (50 °F).

(G) After filling, the sample container shall be capped immediately (within 5 seconds) to leave a minimum headspace in the container.

(H) The sample containers shall immediately be cooled and maintained at a temperature below 10 °C (50 °F) for transfer to the laboratory.

§ 61.356 Recordkeeping requirements.

(a) Each owner or operator of a facility subject to the provisions of this subpart shall comply with the recordkeeping requirements of this section. Each record shall be maintained in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified.

(b) Each owner or operator shall maintain records that identify each waste stream at the facility subject to this subpart, and indicate whether or not the waste stream is controlled for benzene emissions in accordance with this subpart. In addition the owner or operator shall maintain the following records:

(1) For each waste stream not controlled for benzene emissions in accordance with this subpart, the records shall include all test results, measurements, calculations, and other documentation used to determine the following information for the waste stream: waste stream identification, water content, whether or not the waste stream is a process wastewater stream, annual waste quantity, range of benzene concentrations, annual average flow-weighted benzene concentration, and annual benzene quantity.

§ 61.357 Reporting requirements.

(a) Each owner or operator of a chemical plant, petroleum refinery, coke by-product recovery plant, and any facility managing wastes from these industries shall submit to the Administrator within 90 days after January 7, 1993, or by the initial startup for a new source with an initial startup after the effective date, a report that summarizes the regulatory status of each waste stream subject to §61.342 and is determined by the procedures specified in §61.355(c) to contain benzene. Each owner or operator subject to this subpart who has no benzene onsite in wastes, products, by-products, or intermediates shall submit an initial report that is a statement to this effect. For all other owners or operators subject to this subpart, the report shall include the following information:

(b) If the total annual benzene quantity from facility waste is less than 1 Mg/yr (1.1 ton/yr), then the owner or operator shall submit to the Administrator a report that updates the information listed in paragraphs (a)(1) through (a)(3) of this section whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more.

(c) If the total annual benzene quantity from facility waste is less than 10 Mg/yr (11 ton/yr) but is equal to or greater than 1 Mg/yr (1.1 ton/yr), then the owner or operator shall submit to the Administrator a report that updates the information listed in paragraphs (a)(1) through (a)(3) of this section. The report shall be submitted annually and whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 10 Mg/yr (11 ton/yr) or more. If the information in the annual report required by paragraphs (a)(1) through (a)(3) of this section is not changed in the following year, the owner or operator may submit a statement to that effect.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION

Source Name: **Heritage Environmental Services**
Source Address: **7901 West Morris Street, Indianapolis, Indiana 46231**
Mailing Address: **7901 West Morris Street, Indianapolis, Indiana 46231**
MSOP No.: **097-22634-00122**

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 Notification

☐ 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:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
And
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
NEW SOURCE REVIEW
and
MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Heritage Environmental Services, LLC**
Address:	**7901 West Morris Street**
City:	**Indianapolis**
Phone #:	**(317) 486-2778**
MSOP #:	**097-22634-00122**

I hereby certify that Heritage Environmental Services, LLC is ☐ still in operation.
☐ no longer in operation.

I hereby certify that Heritage Environmental Services, LLC is ☐ in compliance with the requirements of MSOP 097- 22634-00122.
☐ not in compliance with the requirements of MSOP 097-22634-00122.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865
And
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
MINOR SOURCE OPERATING PERMIT

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMI LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

Mail to: City of Indianapolis, Air Permits
2700 S. Belmont Avenue
Indianapolis, IN 46221

Permit Administration & Development Section
Office Of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Heritage Environmental Services, LLC
7901 West Morris Street
Indianapolis, Indiana 46231

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make
these representations on behalf of _____ .
(Company Name)

4. I hereby certify that Heritage Environmental Services, LLC, 7901 West Morris Street, Indianapolis, Indiana, 46231, completed construction of the containment building, identified as 030 on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on January 13, 2006 and as permitted pursuant to **New Source Construction and Minor Source Operating Permit, MSOP 097-22634-00122, Plant ID No. 097-00122** issued on _____.

Further Affiant said not.
I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires:

_____
Signature

_____
Name (typed or printed)

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

Addendum to the Technical Support Document for a New Source Review (NSR) and Minor Source Operating Permit (MSOP)

Source Name:	**Heritage Environmental Services, LLC**
Source Location:	**7901 West Morris Street, Indianapolis, IN 46231**
County:	**Marion**
SIC Code:	**4953**
Operation Permit No.:	**097-22634-00122**
Permit Reviewer:	**Anh-tuan Nguyen**

On November 30, 2006, the Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Heritage Environmental Services had applied for a Minor Source Operating Permit. The notice also stated that IDEM, OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

IDEM, OAQ and OES are making the following administrative changes to the permit. Bolded language has been added and the language with strikeout has been deleted.

IDEM, OAQ and OES Change 1:

The Certification form referred to by Condition B.9 was inadvertently left out of the permit. IDEM, OAQ and OES has inserted the following form into the permit and updated the Table of Contents.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION

Source Name: **Heritage Environmental Services**
Source Address: **7901 West Morris Street, Indianapolis, Indiana 46231**
Mailing Address: **7901 West Morris Street, Indianapolis, Indiana 46231**
MSOP No.: **097-22634-00122**

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 Notification

☐ 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:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Technical Support Document (TSD) for a New Source Review (NSR) and Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	Heritage Environmental Services, LLC
Source Location:	7901 West Morris Street
County:	Marion
SIC Code:	4953
Operation Permit No.:	097-22634-00122
Permit Reviewer:	Anh-tuan Nguyen

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Heritage Environmental Services, LLC relating to the construction and operation of a waste treatment and disposal facility.

New Emission Units and Pollution Control Equipment

The source consists of the following new emission unit, which will be constructed in 2006.

(a) One (1) containment building, identified as 030, installed in 2006, with a grain loading of 0.01 grains per standard cubic foot (gr/dscf), using a pulse jet baghouse for PM control, and exhausting to stack 30.

Permitted Emission Units and Pollution Control Equipment

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

(a) Aqueous wastewater treatment operations, identified as 001, installed in 1999, with NO_x emissions controlled by a Packed Bed Scrubber, with a maximum capacity of 12,000 cubic feet per minute (cfm), exhausting to stack 1.

(b) Silo storage and pneumatic handling of lime, installed in 1989, identified as 002 through 006, controlled by five (5) Pulse Jet Baghouses for PM control, and one (1) back-up pulse jet baghouse, identified as 013, installed in 1993, each with a grain loading of 0.03 grains per standard cubic foot (gr/dscf), and a maximum throughput of 14,000 tons per year, and exhausting to stacks 2 through 6.

(c) One (1) natural gas fired boiler, identified as 007, installed in 1978, with a maximum capacity of 8.4 million Btu per hour (MMBtu/hr), and exhausting to stack 7.

(d) One (1) natural gas fired boiler, identified as 008, installed in 1994, with a maximum capacity of 8.4 million Btu per hour (MMBtu/hr), and exhausting to stack 8.

(e) One (1) natural gas fired CDU hot oil heater, identified as 009, installed in 1984, with a maximum capacity of 5.8 million Btu per hour (MMBtu/hr), and exhausting to stack 9.

(f) One (1) polishing building, identified as 010, installed in 1989, with an air flow rate of 400 cubic feet per minute (cfm), using a packed bed scrubber as control for NO_x, and exhausting to stack 10.

(g) One (1) natural gas fired oil processing/secondary oxidation chamber, identified as 011, with a maximum capacity of 2400 gallons per hour (gal/hr)/4.1 million Btu per hour (MMBtu/hr), and exhausting to stack 11.

(h) One (1) natural gas fired hot water heater, identified as 012, installed in 1984, with a maximum capacity of 2.0 million Btu per hour (MMBtu/hr), and exhausting to stack 12.

(i) One (1) containment building, identified as 015, installed in 2002, with a grain loading of 0.01 grains per standard cubic foot (gr/dscf), using a pulse jet baghouse for PM control, and exhausting to stack 15.

(j) One (1) natural gas fired furnace, identified as 018, installed in 2000, with a maximum capacity of 0.5 million Btu per hour (MMBtu/hr).

(k) One (1) parts washer, identified as 019, with a maximum capacity of one (1) gallon per day.

(l) Supplemental fuel tanks, identified as 020, installed in 1978, with a maximum capacity of 7500 gallons per hour.

(m) Supplemental fuel tank loading operations, identified as 021, installed in 1978, with a maximum capacity of 7500 gallons per hour.

(n) Oil product tanks, identified as 022, installed in 1978, with a maximum capacity of 5100 gallons per hour.

(o) Oil tanker loading operations, identified as 023, installed in 1978, with a maximum capacity of 5100 gallons per hour.

(p) One (1) natural gas fired truck boiler, identified as 024, installed in 1984, with a maximum capacity of 2.0 million Btu per hour (MMBtu/hr), and exhausting to stack 24.

(q) QC Lab Hoods, identified as 025, installed in 1978, with an air flow rate of 200 cubic feet per minute (cfm), and exhausting to stack 25.

(r) One (1) de-pack air handling system, identified as 026, installed in 1978, with an air flow rate of 300 cubic feet per minute (cfm), and exhausting to stack 26.

(s) One (1) empty paint-can crusher, identified as 027, installed in 1994, with a maximum capacity of 100 cans per hour.

(t) One (1) vial shredder, identified as 028, installed in 1994, with a maximum capacity of 100 vials per hour.

(u) Two (2) lean water tank, identified as 029, installed in 1978, with a maximum capacity of 3000 gallons per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP 0122, issued on October 18, 1993 by the City of Indianapolis;

(b) Exemption E097-11935-00122, issued on May 2, 2000 by the City of Indianapolis; and

(c) Registration R 097-15407-00122, issued on May 19, 2003 by the City of Indianapolis.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{o}F)
1	001	45	3 x 4	12000	77
2	002	42	0.5	1000	77
3	003	42	0.5	1000	77
4	004	58	0.5	1000	77
5	005	58	0.5	1000	77
6	006	58	0.5	1000	77
7	007	29	1.25	1500	150
8	008	29	1.25	1500	150
9	009	29	1.25	1500	150
10	010	30.5	0.75	400	77
11	011	34.5	2.5	2400	150
12	012	42	0.5	900	77
13	013	58	0.5	900	77
15	015	42	2.0	47000	77
25	025	20	0.5	200	77
26	026	20	0.5	300	77
30	030	42	2.0	47000	77

Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

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

A complete application for the purposes of this review was received on January 13, 2006.

Emission Calculations

See Appendix A (pages 1 through 6) of this document for detailed emission calculations.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	42.16
PM-10	42.16
SO_2	0.29
VOC	12.71
CO	2.87
NO_x	19.0

HAPs	Potential to Emit (tons/yr)
Single	0.031
Total	0.113

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM-10 is greater than 25 tons per year and less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants is less than 100 tons per year. Therefore, the provisions of 326 IAC 2-7 do not apply. An MSOP will be issued.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

County Attainment Status

The source is located in Marion County.

Pollutant	**Status**
PM-2.5	non-attainment
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient

Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.

(c) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO_2, NO_2, CO, and Lead. 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.

(d) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

(e) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	42.16
PM-10	42.16
SO_2	0.29
VOC	12.71
CO	2.87
NO_x	19.0
Single HAP	0.031
Combination HAPs	0.113

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.

(b) These emissions were based on information provided in the permit application.

Proposed Modification

PTE from the proposed modification (based on 8760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
New Containtment Building (030)	15.0	15.0	0	0	0	0
PSD or Offset Threshold Level	100	100	100	100	100	100

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 097-22634-00122, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

(b) This source is not subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP), 326 IAC 14, 40 CFR Part 63, Subpart T, because the solvent used does not contain any of the halogenated HAP solvents listed in §63.460(a).

(c) Heritage Environmental Services, LLC is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, 40 CFR 61.340, Subpart FF (National Emission Standard for Benzene Waste Operations) because the source owns and operates a hazardous waste treatment, storage, and disposal facility that treats, stores, or disposes of hazardous waste generated of chemical manufacturing plants, coke by-product recovery plants, and petroleum refineries.

Nonapplicable portions of the NESHAP will not be included in the permit. The applicable portions of the NESHAP are:

1) 40 CFR 61.340(a)
2) 40 CFR 61.340(b)
3) 40 CFR 61.341
4) 40 CFR 61.342(a)
5) 40 CFR 61.342(a)(1)
6) 40 CFR 61.342(a)(2)
7) 40 CFR 61.342(a)(3)
8) 40 CFR 61.342(a)(4)
9) 40 CFR 61.342(f)
10) 40 CFR 61.342(f)(1)
11) 40 CFR 61.342(f)(2)

12) 40 CFR 61.355(a)(1)
13) 40 CFR 61.355(a)(1)(i)
14) 40 CFR 61.355(a)(1)(ii)
15) 40 CFR 61.355(a)(1)(iii)
16) 40 CFR 61.355(a)(2)
17) 40 CFR 61.355(a)(5)
18) 40 CFR 61.355(a)(5)(i)
19) 40 CFR 61.355(a)(5)(ii)
20) 40 CFR 61.355(b)(3)
21) 40 CFR 61.355(c)(1)(i)(C)
22) 40 CFR 61.355(c)(1)(ii)
23) 40 CFR 61.355(c)(1)(iii)
24) 40 CFR 61.355(c)(2)
25) 40 CFR 61.355(c)(3)
26) 40 CFR 61.355(c)(3)(i)
27) 40 CFR 61.355(c)(3)(ii)
28) 40 CFR 61.355(c)(3)(ii)(A)
29) 40 CFR 61.355(c)(3)(ii)(B)
30) 40 CFR 61.355(c)(3)(ii)(C)
31) 40 CFR 61.355(c)(3)(ii)(D)
32) 40 CFR 61.355(c)(3)(ii)(E)
33) 40 CFR 61.355(c)(3)(ii)(F)
34) 40 CFR 61.355(c)(3)(ii)(G)
35) 40 CFR 61.355(c)(3)(ii)(H)
36) 40 CFR 61.356(a)
37) 40 CFR 61.356(b)(1)
38) 40 CFR 61.357(a)
39) 40 CFR 61.357(b)
40) 40 CFR 61.357(c)

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM10 (as surrogate for PM2.5). Therefore, the Non-attainment New Source Review requirements are not applicable.

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) are not applicable.

326 IAC 2-3 (Emission Offset)

Marion County has been designated as basic nonattainment for the 8-hour ozone standard. The potential to emit of NOx and VOC from this source is less than 100 tons per year for each pollutant. Therefore, the requirements of 326 IAC 2-3 do not apply.

326 IAC 2-4.1 (Hazardous Air Pollutants)

This source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because, as an MSOP source, it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 14 (Emission Standards for Hazardous Air Pollutants)

See "Federal Rule Applicability" section.

State Rule Applicability – Individual Facilities

326 IAC 6 (Particulate Rules)

The Permittee does not have the potential to emit more than one hundred (100) tons per year or actual emissions of tens (10) tons per year of particulate matter. Therefore, 326 IAC 6.5-1 does not apply. This Source does not meet the definition of "Manufacturing Process." Therefore, 326 IAC 6-3 does not apply.

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

(a) The boiler, identified as emission unit 007, is subject to the provisions of 326 IAC 6-2-2 because it is a source of indirect heat and is located in Marion County and was constructed prior to September 21, 1983. Particulate emissions from indirect heating facility, 007, shall be limited by the following equation:

$$Pt = 0.87/Q^{0.16}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

For Q less than 10 million Btu per hour (MMBtu/hr), Pt shall not exceed 0.60. Maximum operating capacity for 007 is less than 10 million Btu per hour (MMBtu/hr). Therefore, particulate matter emissions from the boiler, 007, shall not exceed 0.6 pounds per million Btu (lbs/MMBtu).

(b) Emission units 008, 009, 011, 012, 018 and 024 are subject to the provisions of 326 IAC 6-2-4 because they are sources of indirect heat and are located in Marion County and were constructed after September 21, 1983. Particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q =Total maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

The limitation for emission units 009, 011, 012 and 024 constructed in 1984 is 0.55 pounds per million Btu (lbs/MMBtu). The limitation for emission unit 008 constructed in 1994 is 0.49 lbs/MMBtu. The limitation for emission unit 018 constructed in 2000 is 0.48 lbs/MMBtu.

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

The Permittee has no individual facility with the potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-3 (Organic Solvent Degreasing Operation)

Pursuant to 326 IAC 8-3-1(a)(2), the parts washer identified as emission unit 019 is subject to 326 IAC 8-3-2 because the source is located in Marion County, performs organic solvent degreasing operations and began operations after January 1, 1980. Pursuant to 326 IAC 8-3-1(b)(1)(A), the parts washer identified as emission unit 019 contains a remote solvent reservoir. Therefore, 326 IAC 8-3-5 does not apply.

(a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations existing as of January 1, 1980 located in Marion County, the Permittee shall:

(1) Equip the cleaner with a cover;
(2) Equip the cleaner with a facility for draining cleaned parts;
(3) Close the degreaser cover whenever parts are not being handled in the cleaner;
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(5) Provide a permanent, conspicuous label summarizing the operation requirements;
(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Conclusion

Registration 097-15407-00122 issued on May 19, 2003 is being revoked by 097-23715-00122 The addition of the new containment building has increased the potential to emit of the source from Registration to Minor Source Operating Permit (MSOP) level.

The construction and operation of this waste treatment and disposal facility shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 097-22634-00122.

Company Name: Heritage Environmental Services, LLC
Address City IN Zip: 7901 West Morris Street Indianapolis, Indiana 46231
CP: 097-22634-00122
Reviewer: Anh-tuan Nguyen
Date: 27-Mar-06

Emissions Calculation for Oil Processing, Emissions Unit 011

*The maximum rate of used oil processed is 2,400 gallons per hour.
*The SO_2 content of the oil is 2 x 10^{-5} pounds per gallon.
*The VOC content of the oil is 1 x 10^{-3} pounds per gallon.

Potential Emissions Calculations

2,400 gal / hr * 2 x 10^{-5} lbs / gal * 1 ton / 2000 lbs * 8760 hr / yr
= **0.21 tons SO_2 emitted per year**

2,400 gal / hr * 1 x 10^{-3} lbs / gal * 1 ton / 2000 lbs * 8760 hr / yr
= **10.5 tons VOC emitted per year**

Emissions Calculation for Degreasing, Emissions Unit 019

*The cold cleaner used is Crystal Clean, CC100 + Parts Washing Solvent.
*The density of the cleaner is 6.54 pounds per gallon (lbs/gal) from MSDS
*The maximum consumption is one (1) gallon per day.

Potential Emissions Calculations

1 gal / day * 6.54 lbs / gal * 1 ton / 2000 lbs * 365 days / yr
= **1.199 tons / year VOC emitted**

Emissions Calculation for Tank Truck Loading, Emissions Unit 021

*The annual throughput is 2.734 million gallons supplemental fuel (sf).
*The total emission factor is .2243 pound per 1,000 gallons from AP42, Chapter 5.2, Equation 1
*The percent VOC of supplemental fuel is 49 from TANKS.

Potential Emissions Calculations

2.734 x 10^{6} gallons * 0.2243 lbs sf / 1000 gallons * 0.49 lb VOC / 1 lb sf
* 1 ton / 2000 lbs = **0.15 tons / year VOC emitted**

Appendix A: PM Emission Calculations
Storage and Handling of Bulk Material
& Containment Buildings

Company Name: **Heritage Environmental Services, LLC**
Address City IN Zip: **7901 West Morris Street, Indianapolis, Indiana 46231**
Permit Number: **097-22634-00122**
Reviewer: **Anh-tuan Nguyen**
Date: **2-Oct-06**

Material handled/stored: Lime
Method of handling: Pneumatic
Type of Storage: Silo

Emissions Unit	Maximum Rate (tons/hr)	Emission Factor conveying (lb/ton)	Maximum Uncontrolled Emissions (tons/yr)	Emission Factor storage (lb/ton)	Maximum Uncontrolled Emissions (tons/yr)	Total Uncontorlled emission (tons/yr)
002	20	0.0036	0.315	0.007	0.683	0.999
003	20	0.0036	0.315	0.007	0.683	0.999
004	20	0.0036	0.315	0.007	0.683	0.999
005	20	0.0036	0.315	0.007	0.683	0.999
006	20	0.0036	0.315	0.007	0.683	0.999
					Total	4.993

Methodology
Emission Factors are from AP 42, Chapter 11.26, Tables 11.26-1, SCC # 3-05-089-58 and 3-05-089-85
Maxium uncontrolled emissions (tons/yr) = Maxium emission rate (tons/hr) * emission factor (lb/ton)* 8760 hours * 1 ton/2000 lbs

Containment Buildings

Emissions Unit	Maximum Rate (ft^3/hr)	*Emission Factor (gr/ft^3)	Emission Rate (lb/hr)	Maximum Uncontrolled Emissions (tons/yr)	Pollution Control Efficiency	Maximum Controlled Emissions (tons/yr)
015	2,820,000	0.01	4.029	17.645	0.98	0.353
030	2,820,000	0.01	4.029	17.645	0.98	0.353
			Total	35.290		

Methodology
* The emission factor was based on the outlet grain loading (0.0001 gr/ft^3) provided by the manufacturer and using a baghouse removal efficiency of 99%. The calculation is as follows:
Emission factor (gr/ft^3) = outlet grain loading / (1 - removal efficiency)

Appendix A: Emission Calculations
Natural Gas Combustion Only
& Containment Buildings

Company Name: **Heritage Environmental Services, LLC**
Address City IN Zip: **7901 West Morris Street, Indianapolis, Indiana 46231**
Permit Number: **097-22634-00122**
Reviewer: **Anh-tuan Nguyen**
Date: **2-Oct-06**

Emissions Unit	Heat Input Capacity MMBtu/hr
007	8.4
008	8.4
009	5.8
011	4.1
012	2
018	0.5
024	2
	31.2

Potential Throughput MMCF/yr: 273.3

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	1.872	1.872	0.082	13.666	0.724	2.870

Containment Buildings

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: VOC Emission Calculations
Supplemental Fuel Tanks, 020
From TANKS 4.0 & Containment Buildings

Company Name: **Heritage Environmental Services, LLC**
Address City IN Zip: **7901 West Morris Street, Indianapolis, Indiana 46231**
Permit Number: **097-22634-00122**
Reviewer: **Anh-tuan Nguyen**
Date: **2-Oct-06**

4 tanks

	Components	Losses per tank (lbs/yr)			Total VOC Emissions (tons/yr)	Total HAP Emissions (tons/yr)
	supplemental fuel	Working Loss	Breathing Loss	Total Loss		
*	Acetone	38.82	0.16	38.98		
	Distillate fuel oil no. 2	7.51	0.03	7.54	0.01508	
**	Ethylbenzene	1.21	0	1.21	0.00242	0.00242
**	Methyl ethyl ketone	13.11	0.05	13.16	0.02632	0.02632
**	Methyl isobutyl ketone	1.41	0.01	1.42	0.00284	0.00284
***	Methylene chloride	15.29	0.06	15.35		0.0307
**	Styrene	2.92	0.01	2.93	0.00586	0.00586
**	Tetrachloroethylene	0.19	0	0.19	0.00038	0.00038
**	Toluene	11.51	0.05	11.56	0.02312	0.02312
***	Trichloroethane (1,1,1)	3.61	0.01	3.62		0.00724
	Trichloroethylene	3.9	0.02	3.92	0.00784	
	Unidentified Components	15.786	0.066	15.852	0.031704	
**	Xylene (-m)	6.93	0.03	6.96	0.01392	0.01392
	Total	122.196	0.496	122.692	**0.129484**	**0.1128**

Total Emissions (tons/yr) = Total Loss (lbs/yr) * 1 ton / 2000 lbs * 4 tanks
*non-VOC
**HAP
***non-VOC, but is a HAP

Appendix A: NOx Emission Calculations

Company Name: **Heritage Environmental Services, LLC**
Address City IN Zip: **7901 West Morris Street, Indianapolis, Indiana 46231**
Permit Number: **097-22634-00122**
Reviewer: **Anh-tuan Nguyen**
Date: **2-Oct-06**

Metpro/Duall Scrubber

						Before control			After control	
Emission Unit 01	Air flow rate	air density	air molecular weight	*Max NO_2 concentration	NO_2 molecular weight	NO_2 concentration		Scrubber Removal Eff.	NO_2 concentration	
	ft3/min	lb/ft3	lb/mol	ppmv	lb/mol	lb/hr	tons/yr	%	lb/hr	tons/yr
	5,235	0.0776	28.96	25	46	0.97	**4.24**	85	0.15	0.64

Polishing Building Scrubber

	Before control			After control	
Emission Unit 10	*Max NO_2 Concentration	NO_2 concentration	Scrubber Removal Eff.	NO_2 concentration	
	lb/hr	tons/yr	%	lb/hr	tons/yr
	0.25	**1.10**	85	0.04	0.16

Methodology

*maximum NO_2 value used is the maximum concentration sampled by the source

Emission Unit 01

NO_2 concentration (lb/hr) = air flow rate (ft3/min) * 60 min/hr * air density (lb/ft3) / air molecular weight (lb/mol) * NO_2 concentration (lb/mol) / 1000000 * NO_2 molecular weight (lb/mol)

Emissin Unit 01 & 10

*NO_2 concentration (tons/yr) = max NO2 concentration (lb/hr) * 8760 / 2000

Company Name: **Heritage Environmental Services, LLC**
Address City IN Zip: **7901 West Morris Street, Indianapolis, Indiana 46231**
Permit Number: **097-22634-00122**
Reviewer: **Anh-tuan Nguyen**
Date: **2-Oct-06**

SUMMARY OF CALCULATED POTENTIAL EMISSION RATES - BEFORE CONROLS

Emission Unit	PM	SO2	NOx	VOC	CO	HAPs
1			4.24			
2	0.999					
3	0.999					
4	0.999					
5	0.999					
6	0.999					
7	0.504	0.022	3.679	0.195	0.773	
8	0.504	0.022	3.679	0.195	0.773	
9	0.348	0.015	2.540	0.135	0.533	
10			1.100			
11	0.246	0.221	1.796	10.595	0.377	
12	0.120	0.005	0.876	0.046	0.184	
13						
15	17.645					
18	0.030	0.001	0.219	0.012	0.046	
19				1.199		
20				0.129		0.113
21				0.150		
22						
23						
24	0.120	0.005	0.876	0.046	0.184	
25						
26						
27						
28						
29						
30	17.645					
Total	**42.157**	**0.291**	**19.006**	**12.702**	**2.870**	**0.113**
	PM	**SO2**	**NOx**	**VOC**	**CO**	**HAPs**