



DATE: April 22, 2008

TO: Interested Parties / Applicant

RE: Insituform Technologies, Inc. / SPR097-26144-00585

FROM: Timothy J. Method
Environmental Coordinator

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 501, 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



Air Quality Hotline: 317-327-4AIR | knozone.com

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



April 22, 2008

Mr. James Rothe
National Wetout Manager
Insituform Technologies, Inc.
11511 Phillips Highway
Jacksonville, FL 32256-1639

Certified Mail: 7007 0710 0005 3965 6824

Re: First Significant Permit Revision
097-26144-00585 to
FESOP No.: F097-22873-00585

Dear Mr. Rothe:

Insituform Technologies, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) F097-22873-00585 on July 24, 2006 for the operation of a flexible pipeline liner manufacturing facility located at 2130 Stout Field West Drive, Indianapolis, Indiana. The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) received an application on February 21, 2008, relating to the construction of a new wetout line to incorporate a second wetout process, identified as "Integral Lining System" (ILS). The source currently operates one wetout process, identified as "Cure In Place Process" (CIPP) and has taken a throughput limit of 10,000 tons of resin. Insituform Technologies, Inc. wishes to divide the current 10,000 ton resin throughput among the two (2) different wetout processes. Pursuant to the provisions of 326 IAC 2-8-11.1(g)(2), the FESOP, F097-22873-00585, is hereby revised as described in the enclosed Technical Support Document. Please find attached a copy of the revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Anh-tuan Nguyen at (317) 327-2353.

Sincerely,

Original Signed by

Timothy J. Method
Environmental Coordinator
Department of Public Works

Attachments: Revised Permit
an

cc: Air Permits-2
Air Compliance – Matt Mosier
IDEM, OAQ – Mindy Hahn
US EPA Region 5
Marion County Health Dept.



Air Quality Hotline: 317-327-4AIR | knozone.com

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



**NEW SOURCE REVIEW
AND
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**Insituform Technologies, Inc.
2130 Stout Field West Drive
Indianapolis, Indiana Zip 46241**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 FESOP.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F097-22873-00585	
Original signed by: Felicia A. Robinson Administrator Indianapolis Office of Environmental Services	Issuance Date: July 24, 2006 Expiration Date: July 24, 2011
First Significant Permit Revision: SPR097-26144-00585	Conditions affected: Entire Permit
Issued by: Original Signed by Timothy J. Method, Environmental Coordinator Department of Public Works	Issuance Date: April 22, 2008 Expiration Date: July 24, 2011



Air Quality Hotline: 317-327-4AIR | knozone.com

**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

SECTION A SOURCE SUMMARY.....4
A.1 General Information [326 IAC 2-8-3(b)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
A.4 FESOP Applicability [326 IAC 2-8-2]

SECTION B GENERAL CONDITIONS6
B.1 Definitions [326 IAC 2-8-1]
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)][326 IAC 2-5.1-4][326 IAC 2-8]
B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]
B.5 Term of Conditions [326 IAC 2-1.1-9.5]
B.6 Enforceability [326 IAC 2-8-6]
B.7 Severability [326 IAC 2-8-4(4)]
B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]
B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
B.14 Emergency Provisions [326 IAC 2-8-12]
B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.16 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]
B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
B.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
B.19 Permit Renewal [326 IAC 2-8-3(h)]
B.20 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.22 Permit Revision Requirement [326 IAC 2-8-11.1]
B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
B.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.25 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]
B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS17

Emission Limitations and Standards [326 IAC 2-8-4(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]
C.2 Overall Source Limit [326 IAC 2-8]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

Testing Requirements [326 IAC 2-8-4(3)]
C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]
C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Flexible Pipeline Liner Facility23

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)[326 IAC 2-8-4]
[326 IAC 8-1-6][326 IAC 2-4.1]

Compliance Determination Requirements

- D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.3 Record Keeping Requirements
- D.1.4 Reporting Requirements

Certification Form.....26

Emergency Occurrence Form27

Quarterly Report Form – Mixers 1- 3, Conveyors 1 – 3, Mixer 4, Conveyor 4, Tanks 1-8 29 - 31

Quarterly Report Form – Scrap 132

Quarterly Deviation and Compliance Monitoring Report Form33

Affidavit of Construction35

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 Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a flexible pipeline liner manufacturing facility.

Source Address:	2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address:	17999 Edison Avenue, Chesterfield, Missouri 63005
General Source Phone:	(636) 530-8000
SIC Code:	1623
Source Location Status:	Marion County Nonattainment for PM2.5 Attainment for all other criteria pollutants.
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Three (3) static mixers, identified as Mixer 1, Mixer 2 and Mixer 3, constructed in 2006, using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (b) Three (3) wetout conveyors, identified as Conveyor 1, Conveyor 2 and Conveyor 3, constructed in 2006, using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (c) One (1) scrap resin building, identified as Scrap 1, constructed in 2006, with a maximum capacity of 2 barrels per day, exhausting through a stack, identified as Stack 9.
- (d) Eight (8) liquid resin storage tanks, constructed in 2006, with a capacity of 5,880 gallons each, containing no more than 45 percent styrene by weight, identified as Tank 1 – 8, each with a maximum throughput of 1800 gallons per hour, exhausting through stacks, identified as Stack 1 – 8.
- (e) One fugitive area, constructed in 2006, consisting of valves, pumps and flanges, identified as Fugitive 1.
- (f) One (1) static mixer, identified as Mixer 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (g) One (1) wetout conveyor, identified as Conveyor 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and OES for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval of if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)][326 IAC 2-5.1-4][326 IAC 2-8]

This document shall become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 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 the 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 and OES 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 the Indianapolis Office of Environmental Services (OES) to this permit.

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

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

B.5 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.6 Enforceability [326 IAC 2-8-6]

-
- (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.7 Severability [326 IAC 2-8-4(4)]

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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (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 the "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, and OES, 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.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and OES may require to determine the compliance status of the source.

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

The PMP extension notification does not require the certification by the “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 PMP does not require the certification by the “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.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

and

Telephone No.: 317-327-2234 (ask for OES Air Compliance Section)
Facsimile No.: 317-327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 097-22873-00585 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.16 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

B.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by OES at least thirty (30) days in advance of the date this permit is to be reopened, except that OES may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.19 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “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
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (2) If IDEM, OAQ, and OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 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 needed to process the application.

B.20 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- and
- Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Source Modification Requirement [326 IAC 2-2-2]

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

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][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, OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)].

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.6 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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Asbestos Section
2700 South Belmont Avenue
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 the "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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

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

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "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, and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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, and OES 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, and OES that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.
- (c) IDEM, OAQ, and OES reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the OES Administrator 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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of the original FESOP and ending on the last day of the reporting period. All subsequent reporting periods shall be 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.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Three (3) static mixers, identified as Mixer 1, Mixer 2 and Mixer 3, constructed in 2006, using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (b) Three (3) wetout conveyors, identified as Conveyor 1, Conveyor 2 and Conveyor 3, constructed in 2006, using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (c) One (1) scrap resin building, identified as Scrap 1, constructed in 2006, with a maximum capacity of 2 barrels per day, exhausting through a stack, identified as Stack 9.
- (d) Eight (8) liquid resin storage tanks, constructed in 2006, with a capacity of 5,880 gallons each, containing no more than 45 percent styrene by weight, identified as Tank 1 – 8, each with a maximum throughput of 1800 gallons per hour, exhausting through stacks, identified as Stack 1 – 8.
- (e) One fugitive area, constructed in 2006, consisting of valves, pumps and flanges, identified as Fugitive 1.
- (f) One (1) static mixer, identified as Mixer 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (g) One (1) wetout conveyor, identified as Conveyor 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)[326 IAC 2-8-4][326 IAC 8-1-6][326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4:

- (a) The annual resin throughput from the CIPP process shall be limited to 8,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The VOC and HAP emission rates from the static mixers, identified as Mixer 1 – 3, using the CIPP process, shall each not exceed 0.664 pounds per ton of resin throughput.
- (c) The VOC and HAP emission rates from the wetout conveyors, identified as Conveyor 1 – 3, using the CIPP process, shall each not exceed 0.611 pounds per ton.
- (d) The annual amount of scrap resin combined from the CIPP and ILS processes shall be limited to 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (e) The VOC and HAP emission rates from the CIPP and ILS process scrap, exhausting in the scrap resin building, identified as Scrap 1, shall each not exceed 21.23 pounds per ton of scrap resin.
- (f) The annual resin throughput from the ILS process shall be limited to 1,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (g) The VOC and HAP emission rates from the static mixer, identified as Mixer 4, using the ILS process, shall each not exceed 0.201 pounds per ton of resin throughput.
- (h) The VOC and HAP emission rates from the wetout conveyor, identified as Conveyor 4, using the ILS process, shall each not exceed 0.692 pounds per ton of resin throughput.
- (i) The annual resin throughput from the liquid resin storage tanks, identified as Tanks 1 - 8, shall be limited to 10,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these emission limits will limit the potential to emit to less than one hundred (100) tons VOC per year, less than ten (10) tons single HAP per year, and less than twenty-five (25) tons combination HAPs per year. Therefore, 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) are not applicable.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with condition D.1.1(b) – (d), the Permittee shall perform VOC testing within 60 days of achieving the maximum production rate but no later than 180 days after initial startup on at least one static mixer (identified as Mixer 1, 2 or 3), one wetout conveyor (identified as Conveyor 1, 2 or 3) and the scrap resin building (identified as Scrap 1) using methods as approved by the Commissioner.
- (b) In order to demonstrate compliance with condition D.1.1 (d), (g) and (h), the Permittee shall perform VOC testing within 60 days of achieving the maximum production rate but no later than 180 days after initial startup of the ILS process on Mixer 4, Conveyor 4, and Scrap 1 using methods as approved by the Commissioner.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each raw material used.
 - (2) The amount of VOC and HAP containing raw material and solvent used;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (3) The daily amount of resin throughput used by Tanks 1 – 8, Mixers 1 – 3, Conveyors 1 – 3, Mixer 4, and Conveyor 4.
- (4) The daily amount of scrap resin placed in the Scrap 1.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2209**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585
Facility: Mixers 1 – 3, Conveyors 1 - 3
Parameter: Resin throughput the CIPP process
Limit: 8,500 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585
Facility: Mixer 4, Conveyor 4
Parameter: Resin throughput for the ILS process
Limit: 1,500 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585
Facility: Tanks 1 - 8
Parameter: Resin throughput
Limit: 10,000 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585
Facility: Scrap 1
Parameter: Resin throughput
Limit: 50 tons of resin throughput per twelve (12) consecutive month period determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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 46204-2251

Insituform Technologies, Inc
2130 Stout Field West Drive
Indianapolis, Indiana 46241

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 Insituform Technologies Inc., 2130 Stout Field West Drive, Indianapolis, Indiana, 46241, completed construction of the a flexible pipeline liner manufacturing facility on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on March 27, 2006 and as permitted pursuant to **New Source Review and Federally Enforceable Operating Permit, FESOP 097-22873-00585, Plant ID No. 097-00585** 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
Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location
--

Source Name:	Insituform Technologies, Inc.
Source Location:	2130 Stout Field West Drive, Indianapolis, Indiana 46241
County:	Marion
SIC Code:	1623
Operation Permit No.:	F097-22873-00585
Operation Permit Issuance Date:	July 24, 2006
Significant Permit Revision No.:	097-26144-00585
Permit Reviewer:	Anh-tuan Nguyen

On February 21, 2008, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) received an application from Insituform Technologies, Inc. related to a modification to an existing flexible pipeline liner manufacturing facility.

Existing Approvals

The source was issued FESOP No. F97-22873-00585 on July 24, 2006.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							Worst Single HAP (Styrene ²)
	PM	PM10 ¹	SO ₂	NO _x	VOC	CO	Total HAPs	
Conveyors 1 - 3 (CIPP Process)	-	-	-	-	3.06	-	3.06	3.06
Mixers 1 – 3 (CIPP Process)	-	-	-	-	3.32	-	3.32	3.32
Tanks 1 - 8	-	-	-	-	0.06	-	0.06	0.06
Scrap 1	-	-	-	-	0.53	-	0.53	0.53
Fugitive 1	-	-	-	-	2.07	-	2.07	2.07
Total PTE of Entire Source	-	-	-	-	9.04	-	9.04	9.04
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD & Nonattainment NSR Major Source Thresholds	250	100	250	250	250	250	NA	NA
These emissions are based upon FESOP 097-22873-00585 issued on July 24, 2006.								

1 - PM10 is a surrogate for PM2.5
 2 - Styrene is the only HAP emitted.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) Marion County has been designated as nonattainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment regulated pollutant. Insituform Technologies, Inc. has a potential to emit of PM10 below one hundred (100) tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-1.1-5 does not apply for PM2.5.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) have reviewed an application, submitted by Insituform Technologies, Inc. on February 21, 2008, relating to the construction of a new wetout line to incorporate a second wetout process, identified as "Integral Lining System" (ILS). The source currently operates one wetout process, identified as "Cure In Place Process" (CIPP) and has taken a throughput limit of 10,000 tons of resin. Insituform Technologies, Inc. wishes to

divide the current 10,000 ton resin throughput limit among the two (2) different wetout processes. CIPP will have a 8,500 tons of resin throughput limit and ILS will have a 1,500 tons of resin throughput limit.

The following is a list of the new emission units:

- (a) One (1) static mixer, identified as Mixer 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (b) One (1) wetout conveyor, identified as Conveyor 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations. The potential emissions from Tanks 1 - 8 and Fugitive 1 are not affected by this propose revision. These emission points are located prior to the mixers and conveyors and both processes use the same material.

Permit Level Determination – FESOP Revision
--

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	Unrestricted PTE of Proposed Revision (tons/year)							Worst Single HAP (Styrene)
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	
Conveyor 4 (ILS Process)	-	-	-	-	27.28	-	27.28	27.28
Mixers 4 (ILS Process)	-	-	-	-	7.92	-	7.92	7.92
Total PTE of Proposed Revision	-	-	-	-	35.20	-	35.20	35.20
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.								

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g)(2) because it involves adjustment to the existing source-wide emissions limitations to maintain the FESOP status of the source (see PTE of the Entire Source After Issuance of the FESOP Revision Section).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Conveyors 1 - 3 (CIPP Process)	-	-	-	-	3.06 2.60	-	3.06 2.60	3.06 2.60
Mixers 1 – 3 (CIPP Process)	-	-	-	-	3.32 2.82	-	3.32 2.82	3.32 2.82
Conveyor 4 (ILS Process)	-	-	-	-	0.52	-	0.52	0.52
Mixer 4 (ILS Process)	-	-	-	-	0.15	-	0.15	0.15
Tanks 1 - 8	-	-	-	-	0.06	-	0.06	0.06
Scrap 1	-	-	-	-	0.53	-	0.53	0.53
Fugitive 1	-	-	-	-	2.07	-	2.07	2.07
Total PTE of Entire Source	-	-	-	-	9.04 8.75	-	9.04 8.75	3.32 8.75
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD & Nonattainment NSR Major Source Thresholds	250	100	250	250	250	250	NA	NA

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)							
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Conveyors 1 - 3 (CIPP Process)	-	-	-	-	2.60	-	2.60	2.60
Mixers 1 – 3 (CIPP Process)	-	-	-	-	2.82	-	2.82	2.82
Conveyors 4 (ILS Process)	-	-	-	-	0.52	-	0.52	0.52
Mixers 4 (ILS Process)	-	-	-	-	0.15	-	0.15	0.15

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)							
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Tanks 1 - 8	-	-	-	-	0.06	-	0.06	0.06
Scrap 1	-	-	-	-	0.53	-	0.53	0.53
Fugitive 1	-	-	-	-	2.07	-	2.07	2.07
Total PTE of Entire Source					8.75		8.75	8.75
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD & Nonattainment NSR Major Source Thresholds	250	100	250	250	250	250	NA	NA
* US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.								

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The annual resin throughput from the CIPP process shall be limited to 8,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The VOC and HAP emission rates from the static mixers, identified as Mixer 1 – 3, using the CIPP process shall each not exceed 0.664 pounds per ton of resin throughput.
- (3) The VOC and HAP emission rates from the wetout conveyors, identified as Conveyor 1 – 3, using the CIPP process shall each not exceed 0.611 pounds per ton of resin throughput.
- (4) The annual resin throughput from the ILS process shall be limited to 1,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (5) The VOC and HAP emission rates from the static mixer, identified as Mixer 4, using the ILS process shall each not exceed 0.201 pounds per ton of resin throughput.
- (6) The VOC and HAP emission rates from the wetout conveyor, identified as Conveyor 4, using the ILS process shall each not exceed 0.692 pounds per ton of resin throughput.
- (7) The annual amount of scrap resin combined from the CIPP and ILS processes shall be limited to 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (8) The VOC and HAP emission rates from the CIPP and ILS process scrap, exhausting in the scrap resin building, identified as Scrap 1, shall each not exceed 21.23 pounds per ton of scrap resin.

- (9) The annual resin throughput from the liquid resin storage tanks, identified as Tanks 1 - 8, shall be limited to 10,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit of VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

- (b) PSD Minor Source
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) Nonattainment New Source Review
This existing source is not a major stationary source, under nonattainment new source review rules (326 IAC 2-1.1-5) since PM10 (a surrogate for PM2.5) is not emitted at a rate of 100 tons per year or more. Therefore, the Nonattainment New Source Review requirements are not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Group I Polymers and Resins, 40 CFR 63.480, Subpart U (326 IAC 20-19-1), are not included for this proposed revision, since the source does not manufacture or process any of the elastomers listed in 40 CFR 63.482.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Epoxy Resins Production and Non-Nylon Polyamides Production, 40 CFR 63.520, Subpart W (326 IAC 20-20-1), are not included for this proposed revision, since the source does not manufacture resins.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-1.1-5 (Nonattainment 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 a surrogate for PM2.5). This modification will not change the Nonattainment New Source Review minor status because PM10 (as a surrogate for PM2.5) emissions will continue to be less than 100 tons. Therefore, the Nonattainment New Source Review requirements are not applicable. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the mixers and conveyors is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the mixers and conveyors to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 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.

- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
 Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
 The operation of this flexible pipeline liner manufacturing facility does not have fugitive particulate emissions. Therefore, 326 IAC 6-5 does not apply.
- (i) 326 IAC 6.5, 326 IAC 6-2, and 326 IAC 6-3 (Particulate Rules)
 This source does not have potential particulate matter emissions greater than 100 tons per year and since potential PM emissions are less than 10 tons, then actual PM emission will be less than 10 tons. Therefore, 326 IAC 6.5-1 does not apply. This source does not have any facilities defined as "sources of indirect heating." Therefore, 326 IAC 6-2 does not apply. This Source does not have any particulate emissions from the manufacturing process. The process material is in a liquid form. Therefore, 326 IAC 6-3 does not apply.
- (j) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
 This source does not have potential to emit of SO₂ greater than 10 pounds per hour or 25 tons per year. Therefore, 326 IAC 7-1.1 does not apply.
- (k) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
 The Permittee has taken resin throughput limits, which limits each individual facility to less than twenty five (25) tons per year of VOC (See Appendix A, pages 1 through 5). Therefore, 326 IAC 8-1-6 does not apply.
- (l) 326 IAC 12 (New Source Performance Standards)
 See Federal Rule Applicability Section of this TSD.
- (m) 326 IAC 20 (Hazardous Air Pollutants)
 See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements
--

- (a) There are no compliance determination and monitoring requirements applicable to this proposed revision.
- (b) The testing requirements applicable to this proposed revision are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Mixer 4 (ILS Process)	NA	VOC	within 60 days of achieving the maximum production rate but no later than 180 days after starting the ILS Process	Initial Validation
Conveyor 4 (ILS Process)				
Scrap1 (ILS Process)				

Proposed Changes

(a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) In order to distinguish and incorporate the new ILS wetout process, the facility descriptions have been revised. The construction dates have also been included into the existing emission units. Condition A.2 and the facility descriptions in section D.1 have been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Three (3) static mixers, identified as Mixer 1, Mixer 2 and Mixer 3, **constructed in 2006, using the CIPP wetout process**, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (b) Three (3) wetout conveyors, identified as Conveyor 1, Conveyor 2 and Conveyor 3, **constructed in 2006, using the CIPP wetout process**, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (c) One (1) scrap resin building, identified as Scrap 1, **constructed in 2006**, with a maximum capacity of 2 barrels per day, exhausting through a stack, identified as Stack 9.
- (d) Eight (8) liquid resin storage tanks, **constructed in 2006**, with a capacity of 5,880 gallons each, containing no more than 45 percent styrene by weight, identified as Tank 1 – 8, each with a maximum throughput of 1800 gallons per hour, exhausting through stacks, identified as Stack 1 – 8.
- (e) One fugitive area, **constructed in 2006**, consisting of valves, pumps and flanges, identified as Fugitive 1.
- (f) **One (1) static mixer, identified as Mixer 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.**
- (g) **One (1) wetout conveyor, identified as Conveyor 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.**

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Three (3) static mixers, identified as Mixer 1, Mixer 2 and Mixer 3, **constructed in 2006, using the CIPP wetout process**, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (b) Three (3) wetout conveyors, identified as Conveyor 1, Conveyor 2 and Conveyor 3, **constructed in 2006, using the CIPP wetout process**, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.
- (c) One (1) scrap resin building, identified as Scrap 1, **constructed in 2006**, with a maximum capacity of 2 barrels per day, exhausting through a stack, identified as Stack 9.
- (d) Eight (8) liquid resin storage tanks, **constructed in 2006**, with a capacity of 5,880 gallons each, containing no more than 45 percent styrene by weight, identified as Tank 1 – 8, each with a maximum throughput of 1800 gallons per hour, exhausting through stacks, identified as Stack 1 – 8.
- (e) One fugitive area, **constructed in 2006**, consisting of valves, pumps and flanges, identified as Fugitive 1.
- (f) **One (1) static mixer, identified as Mixer 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.**
- (g) **One (1) wetout conveyor, identified as Conveyor 4, approved for construction in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as Bays 0, 1, 2, 6, 2R and 6R.**

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

(2) Permit conditions D.1.1, D.1.2, and D.1.3 have been revised as follows:

D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)[326 IAC 2-8-4]
[326 IAC 8-1-6][326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4:

- (a) The annual resin throughput **from the CIPP process** shall be limited to ~~40,000~~ **8,500** tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The VOC and HAP emission rates from the static mixers, identified as Mixer 1 – 3, **using the CIPP process**, shall **each** not exceed 0.664 pounds per ton of resin throughput.
- (c) The VOC and HAP emission rates from the wetout conveyors, identified as Conveyor 1 – 3, **using the CIPP process**, shall **each** not exceed 0.611 pounds per ton.

- (d) The annual amount of scrap resin **combined from the CIPP and ILS processes** shall be limited to 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (e) The VOC and HAP emission rates from the **CIPP and ILS process scrap, exhausting in the scrap resin building**, identified as Scrap 1, shall **each** not exceed 21.23 pounds per ton of scrap resin.
- (f) **The annual resin throughput from the ILS process shall be limited to 1,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**
- (g) **The VOC and HAP emission rates from the static mixer, identified as Mixer 4, using the ILS process, shall each not exceed 0.201 pounds per ton of resin throughput.**
- (h) **The VOC and HAP emission rates from the wetout conveyor, identified as Conveyor 4, using the ILS process, shall each not exceed 0.692 pounds per ton of resin throughput.**
- (i) **The annual resin throughput from the liquid resin storage tanks, identified as Tanks 1 - 8, shall be limited to 10,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

Compliance with these emission limits will limit the potential to emit to less than one hundred (100) tons VOC per year, less than ten (10) tons single HAP per year, and less than twenty-five (25) tons combination HAPs per year. Therefore, 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) are not applicable.

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with condition D.1.1(b) – (d), the Permittee shall perform VOC testing within 60 days of achieving the maximum production rate but no later than 180 days after initial startup on at least one static mixer (identified as Mixer 1, 2 or 3), one wetout conveyor (identified as Conveyor 1, 2 or 3) and the scrap resin building (identified as Scrap 1) using methods as approved by the Commissioner.
- (b) **In order to demonstrate compliance with condition D.1.1 (d), (g) and (h), the Permittee shall perform VOC testing within 60 days of achieving the maximum production rate but no later than 180 days after initial startup of the ILS process on Mixer 4, Conveyor 4, and Scrap 1 using methods as approved by the Commissioner.**

D.1.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each raw material used.
 - (2) The amount of VOC and HAP containing raw material and solvent used;

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (3) The daily amount of resin throughput used by Tanks 1 – 8, Mixers 1 – 3, and Conveyors 1 – 3, **Mixer 4, and Conveyor 4.**
- (4) The daily amount of scrap resin placed in the Scrap 1.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.
- (3) The existing VOC and HAP quarterly reporting form has been revised to identify the CIPP process and reflect the new throughput limit, a new reporting form has been added for the new ILS process, a new separate form has been added for the liquid resin tanks, and the Scrap 1 reporting form has been revised to clarify the reporting parameter as follows:

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585
Facility: ~~Tanks 1 – 8, Mixers 1 – 3, Conveyors 1 - 3~~
Parameter: ~~VOC and HAP~~ **Resin throughput for the CIPP process**
Limit: ~~40,000~~ **8,500** tons of resin throughput per twelve (12) consecutive month period **with compliance** determined at the end of each month.

...

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585
Facility: **Mixer 4, Conveyor 4**

Parameter: Resin throughput for the ILS process
Limit: 1,500 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585

Facility: Tanks 1 - 8
Parameter: Resin throughput
Limit: 10,000 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
FESOP No.: 097-22873-00585

Facility: Scrap 1
Parameter: ~~VOC and HAP~~ **Resin throughput**
Limit: 50 tons of resin throughput per twelve (12) consecutive month period determined at the end of each month.

QUARTER: _____ YEAR: _____

(b) Upon further review, IDEM, OAQ, and OES have decided to make the following changes to the permit. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) On November 8, 2007, a temporary emergency rule took effect redesignating Marion County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, Marion County is no longer nonattainment for ozone under the 8-hour standard. Also, IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (A.I.) in the permit document. Condition A.1 has been revised as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a flexible pipeline liner manufacturing facility.

~~Authorized individual: National Wetout Manager~~
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
Mailing Address: 17999 Edison Avenue, Chesterfield, Missouri 63005
General Source Phone: (636) 530-8000
SIC Code: 1623
Source Location Status: Marion County
~~Nonattainment for ozone under the 8-hour standard~~
Nonattainment for PM2.5
Attainment for all other criteria pollutants.
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD and Emission Offset Rules and
Nonattainment NSR
Minor Source, Section 112 of the Clean Air Act

- (2) All occurrences of IDEM mailing addresses have been revised to include a mail code (MC) as follows:

Asbestos Section: **MC 61-52 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Permits Branch: **MC 61-53 IGCN 1003**

- (3) All occurrences of the Compliance Data Branch telephone and facsimile numbers have been revised to 317-233-~~5674~~ **0178** and 317-233-~~5967~~ **6865**, respectively.

- (4) IDEM and OES have decided to include the following update to further address and clarify the permit terms and the terms of the conditions. Conditions C.7 and C.14 have been revised as follows:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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, and OES 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, and OES that retesting in ~~one hundred and twenty~~ **one hundred twenty** (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.
- (c) IDEM, OAQ, and OES reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 21, 2008.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 097-26144-00585. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

OES Contact

- (a) Questions regarding this proposed permit can be directed to Anh-tuan Nguyen at Indianapolis Office of Environmental Services, Permits Section, 2700 South Belmont, Indianapolis, Indiana 46221 or by telephone at (317) 327-2353.
- (b) A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem/permits/guide/.

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: 097-26144-00585
Pit ID: 097-00585
Reviewer: Anh-tuan Nguyen
Date: 2/22/2008

SUMMARY OF CALCULATED POTENTIAL EMISSION RATES - BEFORE CONROLS

Emission Unit	PM	PM-10	SO2	NOx	VOC	CO	HAPs
Conveyors 1 - 3 (CIPP Process)	0	0	0	0	72.26	0	72.26
Mixers 1 - 3 (CIPP Process)	0	0	0	0	78.52	0	78.52
Conveyor 4 (ILS Process)	0	0	0	0	27.28	0	27.28
Mixers 4 (ILS Process)	0	0	0	0	7.92	0	7.92
Tanks 1 - 8	0	0	0	0	0.51	0	0.51
Scrap 1**	0	0	0	0	1.75	0	1.75
Fugitive 1	0	0	0	0	2.07	0	2.07
Total	0.00	0.00	0.00	0.00	190.31	0.00	190.31
	PM	PM-10	SO2	NOx	VOC	CO	HAPs

SUMMARY OF CALCULATED POTENTIAL EMISSION RATES with LIMITED THROUGHPUT

Emission Unit	PM	PM-10	SO2	NOx	VOC	CO	HAPs
Conveyors 1 - 3 (CIPP Process)	0	0	0	0	2.60	0	2.60
Mixers 1 - 3 (CIPP Process)	0	0	0	0	2.82	0	2.82
Conveyor 4 (ILS Process)	0	0	0	0	0.52	0	0.52
Mixer 4 (ILS Process)	0	0	0	0	0.15	0	0.15
Tanks 1 - 8	0	0	0	0	0.06	0	0.06
Scrap 1	0	0	0	0	0.53	0	0.53
Fugitive 1	0	0	0	0	2.07	0	2.07
Total	0.00	0.00	0.00	0.00	8.75	0.00	8.75
	PM	PM-10	SO2	NOx	VOC	CO	HAPs

**Appendix A: VOC & HAP Emission Calculations
From Conveyors**

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: 097-26144-00585
Pit ID: 097-00585
Reviewer: Anh-tuan Nguyen
Date: 2/22/2008

CIPP Process

EU ID	Maximum Resin Throughput (tons/hr)	Emission Factor (lbs/ton)	VOC/HAP emissions (lbs/hr)	*VOC/HAP emissions (tons/yr)
Conveyor 1	9	0.611	5.499	24.09
Conveyor 2	9	0.611	5.499	24.09
Conveyor 3	9	0.611	5.499	24.09
Total =			16.497	72.26

FESOP Throughput Limit = 8,500 tons/year

EU ID	Limited Annual Resin Throughput (tons/yr)	Emission Factor (lbs/ton)	Limited VOC/HAP emissions (lbs/yr)	**Limited VOC/HAP emissions (tons/yr)
Conveyors 1 - 3	8,500	0.611	5193.5	2.60

ILS Process

EU ID	Maximum Resin Throughput (tons/hr)	Emission Factor (lbs/ton)	VOC/HAP emissions (lbs/hr)	*VOC/HAP emissions (tons/yr)
Conveyor 4	9	0.692	6.228	27.28

FESOP Throughput Limit = 1,500 tons/year

EU ID	Limited Annual Resin Throughput (tons/yr)	Emission Factor (lbs/ton)	Limited VOC/HAP emissions (lbs/yr)	**Limited VOC/HAP emissions (tons/yr)
Conveyor 4	1,500	0.692	1038	0.52

Methodology

Styrene is the only VOC/HAP emitted.

Emission Factor was taken from performance testing conducted at a similar facility.

* PTE = Maximum Resin Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 (hrs/year) / 2000 (lbs/ton)

** Limited PTE = Limited Resin Throughput (tons/yr) x Emission Factor (lbs/ton) / 2000 (lbs/ton)

Only one process can operate at a time.

**Appendix A: VOC & HAP Emission Calculations
From Mixers**

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: 097-26144-00585
Plt ID: 097-00585
Reviewer: Anh-tuan Nguyen
Date: 2/22/2008

CIPP Process

EU ID	Maximum Resin Throughput (tons/hr)	Emission Factor (lbs/ton)	VOC/HAP emissions (lbs/hr)	*VOC/HAP emissions (tons/yr)
Mixer 1	9	0.664	5.976	26.17
Mixer 2	9	0.664	5.976	26.17
Mixer 3	9	0.664	5.976	26.17
Total =			17.928	78.52

FESOP Throughput Limit = 8,500 tons/year

	Limited Resin Throughput (tons/yr)	Emission Factor (lbs/ton)	Limited VOC/HAP emissions (lbs/yr)	**Limited VOC/HAP emissions (tons/yr)
Mixers 1 - 3	8,500	0.664	5644	2.82

ILS Process

EU ID	Maximum Resin Throughput (tons/hr)	Emission Factor (lbs/ton)	VOC/HAP emissions (lbs/hr)	*VOC/HAP emissions (tons/yr)
Mixer 4	9	0.201	1.809	7.92

FESOP Throughput Limit = 1,500 tons/year

	Limited Resin Throughput (tons/yr)	Emission Factor (lbs/ton)	Limited VOC/HAP emissions (lbs/yr)	**Limited VOC/HAP emissions (tons/yr)
Mixer 4	1,500	0.201	301.5	0.15

Methodology

Styrene is the only VOC/HAP emitted.

Emission Factor was taken from performance testing conducted at a similar facility.

* PTE = Maximum Resin Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 (hrs/year) / 2000 (lbs/ton)

** Limited PTE = Limited Resin Throughput (tons/yr) x Emission Factor (lbs/ton) / 2000 (lbs/ton)

Only one process can operate at a time.

**Appendix A: VOC & HAP Emission Calculations
From TANKS 4.0**

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 4624
Permit Number: 097-26144-00585
Plt ID: 097-00585
Reviewer: Anh-tuan Nguyen
Date: 2/22/2008

EU ID	Component	Losses per tank (lbs/year)			Total VOC emissions (tons/yr)
		Working Loss	² Breathing Loss	Total Loss	
Tank 1	¹ Residual Oil No. 6	0.05	0.00	0.05	0.00
	Styrene	126.39	0.00	126.39	0.06
Tank 2	Residual Oil No. 6	0.05	0.00	0.05	0.00
	Styrene	126.39	0.00	126.39	0.06
Tank 3	Residual Oil No. 6	0.05	0.00	0.05	0.00
	Styrene	126.39	0.00	126.39	0.06
Tank 4	Residual Oil No. 6	0.05	0.00	0.05	0.00
	Styrene	126.39	0.00	126.39	0.06
Tank 5	Residual Oil No. 6	0.05	0.00	0.05	0.00
	Styrene	126.39	0.00	126.39	0.06
Tank 6	Residual Oil No. 6	0.05	0.00	0.05	0.00
	Styrene	126.39	0.00	126.39	0.06
Tank 7	Residual Oil No. 6	0.05	0.00	0.05	0.00
	Styrene	126.39	0.00	126.39	0.06
Tank 8	Residual Oil No. 6	0.05	0.00	0.05	0.00
	Styrene	126.39	0.00	126.39	0.06
				Total =	0.51

* The total emissions from TANKS 4.09d output were 126.39 lbs VOC/year (0.06 tons/year) from tank loading of 10,000 tons of liquid resin in one year. Since the calculations incorporate the maximum annual throughput for the entire facility and the eight tanks are identical, the emission calculations are independent of the particular tank that is filled and the 0.06 tons of VOC/year represent the total emission for all tank loading operations, or from all tanks.

¹ Residual Oil No. 6 was used as surrogate because it is representative of the actual component in the resin.

² The storage tanks are insulated and temperature cooled to prevent "breathing loss."

**Appendix A: VOC& HAP Emission Calculations
From Scrap1 and Fugitive1**

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: 097-26144-00585
Plt ID: 097-00585
Reviewer: Anh-tuan Nguyen
Date: 2/22/2008

Scrap 1

*Emission Factor = 21.23 lbs VOC/ton

0.5% of the total throughput is scrap

Maximum throughput = 10,000 tons per year

Maximum amount of scrap = (10,000 tons x .005) = 50 tons per year

PTE = 50 tons per yr x 21.23 lbs/ton / 2000 = **0.53 tons per yr**

Fugitive1

Component	Stream Type	**Emission Factor per component (lbs/hr)	# Components x Max% VOC/100	VOC Emission Rates	
				(lbs/hr)	(tons/year)
Valves	Light Liquid	0.0089	15.91	0.14	0.62
Pumps	Light Liquid	0.0438	3.54	0.16	0.68
Flanges	Light Liquid	0.0040	44.2	0.18	0.77
Total Fugitive Losses =				0.47	2.07

Methodology

Resin contains Styrene which is considered a HAP. It is assumed that 100% of styrene is emitted.

*Emission Factor was taken from performance testing conducted at a similar facility using mass balance.

** Emission Factor taken from Protocol for Equipment Leak Emission Estimates (Document 453/R-95-017, November 1995)

"Table2-1: SOCFI Average Emission Factors"