



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 17, 2010

RE: Nature's Fuel / 069-27596-00081

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



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**New Source Construction and Federally Enforceable
State Operating Permit
OFFICE OF AIR QUALITY**

**Nature's Fuel
515 South 300 West
Huntington, Indiana 46750**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.

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 under 326 IAC 2-8.

Operation Permit No.: 069-27596-00081	
Issued by:  Iryn Callung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 17, 2010 Expiration Date: May 17, 2015

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plant to convert municipal solid waste to renewable energy.

Source Address:	515 South 300 West, Huntington, Indiana 46750
Mailing Address:	432 E. Cook Road, Fort Wayne, Indiana 46825
General Source Phone Number:	260-490-1888
SIC Code:	2869
County Location:	Huntington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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) One (1) landfill, identified as Huntington City Landfill, constructed in 1970, with a maximum capacity of twenty-two thousand seven hundred sixteen (22,716) tons, or twenty thousand six hundred seven (20,607) megagrams, using no controls, and exhausting to atmosphere;
- Under 40 CFR Part 60, Subpart Cc, this facility is considered an affected source.
- (b) One (1) Waste Receiving Area, identified as RA001, approved of construction in 2009, with a maximum throughput capacity of twenty-two and eighty-three hundredths (22.83) tons per hour, all enclosed, controlled by Emissions Control Baghouse BAG002, with lime injection for HCl control, and exhausting through Stack ES001, consisting of the following:
- (1) Municipal Solid Waste (MSW) storage pile;
 - (2) Solidification pad; and
 - (3) Wood grinder, electric-powered, up to 700HP, and
 - (4) Storage pad;
- (c) One (1) Waste Processing Area, identified as PA001, approved for construction in 2009, with a maximum throughput capacity of twenty-two and eighty-three hundredths (22.83) tons per hour, all enclosed, controlled by Emissions Control Baghouse BAG002, with lime injection for HCl control, and exhausting through Stack ES001, consisting of the following:
- (1) Two (2) rotary dryers, utilizing one (1) natural gas-fired and bio gas-fired (process gas) burners, identified as MAXB001, with a maximum heat input capacity of five million Btu/hr (5 MMBtu/hr);

- (2) Two (2) Flail shredders;
 - (3) Five (5) shear shredders;
 - (4) One (1) Hammermill shredder;
 - (5) Two (2) Trommel sizing screens and one (1) Finger screen;
 - (6) Two (2) Air classifier screens;
 - (7) Several Reject and Waste Metal holding bins, several magnetic separators, and a series of belt conveyors; and
 - (8) One (1) Eddy Current Separator.
- (d) Two (2) Pyrolyzer Systems, both enclosed, collectively identified as PA002, approved for construction in 2010, having a combined maximum throughput of twenty-two and eighty-three hundredths (22.83) tons per hour, with wet Venturi Scrubber, identified as ROTC001; Powerhouse Baghouse, identified as BAG001, with lime injection for HCl control; and Wet Electrostatic Precipitator, identified as WET ESP, all exhausting through Stack ES001, and consisting of the following:
- (1) One (1) pyrolyzer system, identified as Pyro001, enclosed, having a maximum throughput of eleven and four hundred fifteen thousandths (11.415) tons per hour, utilizing one (1) natural gas-fired and bio gas-fired (process gas) burner, identified as MAXB003 with a maximum heat input capacity of ten million Btu/hr (10MMBtu/hr).
 - (2) One (1) pyrolyzer system, identified as Pyro002, enclosed, having a maximum throughput of eleven and four hundred fifteen thousandths (11.415) tons per hour, utilizing one (1) natural gas-fired and bio gas-fired (process gas) burner, identified as MAXB002 with a maximum heat input capacity of ten million Btu/hr (10MMBtu/hr).
 - (3) Two (2) Hot Gas ceramic filters, identified as KCF001 and KFC002;
 - (4) Two (2) cyclone separators, identified as CYL001 and CYC002;
 - (5) Two (2) oil condensing units, identified as COND001 and COND002;
 - (6) Two (2) oil cooler units, identified as COOL001 and COOL002;
 - (7) Two (2) oil filters, identified as OF001 and OF002; and
 - (8) Series of conveyors;
- (e) One (1) enclosed char processing system, identified as PA003, approved for construction in 2010, having a maximum throughput of twenty-two and eighty-three hundredths (22.83) tons per hour, controlled by Powerhouse Baghouse, identified as BAG001, with lime injection for HCl control, venturi wet scrubber, identified as ROTC001, and Wet Electrostatic Precipitator, identified as WET ESP, all exhausting through Stack ES001, and consisting of the following:
- (1) Two (2) char chiller/media separation units, identified as CHCOOL001 and CHCOOL002;
 - (2) Two (2) Media Separator Aspirators;

- (3) One (1) EddyCurrent Separator and one (1) mag separator;
- (4) One (1) Char storage bin; and
- (5) Series of conveyors.

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

This stationary source also includes the following insignificant activities:

- (a) Twenty (20) above-ground bio-oil storage tanks, identified as PRBT001 through PRBT010, and STBT001 through STBT010, each having a maximum storage capacity of thirty thousand (30,000) gallons;
- (b) Twelve (12) raw materials storage silos; and
- (c) Paved and unpaved roads.

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) 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 or 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 also 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), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, 069-27596-00081, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.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] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.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, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (ii) the certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent 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.11 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 no later than July 1 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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 describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality,

Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

- (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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
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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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 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 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.

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

- (a) All terms and conditions of permits established prior to 069-27596-00081 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 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 Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(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 IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 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 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
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- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at 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.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 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, 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.23 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.24 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 no later than 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.25 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

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]

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.
- (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) Pursuant to 326 IAC 2-2 (PSD), 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.

(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 that 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 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.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]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable portions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

C.9 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.12 Instrument 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 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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

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

no later than 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [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.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
- (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

- (1) monitoring results;
- (2) review of operation and maintenance procedures and records; and/or
- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.16 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 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 Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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. This report

shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) landfill, identified as Huntington City Landfill, constructed in 1970, with a maximum capacity of twenty-two thousand seven hundred sixteen (22,716) tons, or twenty thousand six hundred seven (20,607) megagrams, using no controls, and exhausting to atmosphere;
- Under 40 CFR Part 60, Subpart Cc, this facility is considered an affected source.
- (b) One (1) Waste Receiving Area, identified as RA001, approved of construction in 2009, with a maximum throughput capacity of twenty-two and eighty-three hundredths (22.83) tons per hour, all enclosed, controlled by Emissions Control Baghouse BAG002, with lime injection for HCl control, and exhausting through Stack ES001, consisting of the following:
- (1) Municipal Solid Waste (MSW) storage pile;
 - (2) Solidification pad; and
 - (3) Wood grinder, electric-powered, up to 700HP, and
 - (4) Storage pad;
- (c) One (1) Waste Processing Area, identified as PA001, approved for construction in 2009, with a maximum throughput capacity of twenty-two and eighty-three hundredths (22.83) tons per hour, all enclosed, controlled by Emissions Control Baghouse BAG002, with lime injection for HCl control, and exhausting through Stack ES001, consisting of the following:
- (1) Two (2) rotary dryers, utilizing one (1) natural gas-fired and bio gas-fired (process gas) burners, identified as MAXB001, with a maximum heat input capacity of five million Btu/hr (5 MMBtu/hr);
 - (2) Two (2) Flail shredders;
 - (3) Five (5) shear shredders;
 - (4) One (1) Hammermill shredder;
 - (5) Two (2) Trommel sizing screens and one (1) Finger screen;
 - (6) Two (2) Air classifier screens;
 - (7) Several Reject and Waste Metal holding bins, several magnetic separators, and a series of belt conveyors; and
 - (8) One (1) Eddy Current Separator.
- (d) Two (2) Pyrolyzer Systems, both enclosed, collectively identified as PA002, approved for construction in 2010, having a combined maximum throughput of twenty-two and eighty-three hundredths (22.83) tons per hour, with wet Venturi Scrubber, identified as ROTC001; Powerhouse Baghouse, identified as BAG001, with lime injection for HCl control; and Wet Electrostatic Precipitator, identified as WET ESP, all exhausting through Stack ES001, and consisting of the following:

- (1) One (1) pyrolyzer system, identified as Pyro001, enclosed, having a maximum throughput of eleven and four hundred fifteen thousandths (11.415) tons per hour, utilizing one (1) natural gas-fired and bio gas-fired (process gas) burner, identified as MAXB003 with a maximum heat input capacity of ten million Btu/hr (10MMBtu/hr).
 - (2) One (1) pyrolyzer system, identified as Pyro002, enclosed, having a maximum throughput of eleven and four hundred fifteen thousandths (11.415) tons per hour, utilizing one (1) natural gas-fired and bio gas-fired (process gas) burner, identified as MAXB002 with a maximum heat input capacity of ten million Btu/hr (10MMBtu/hr).
 - (3) Two (2) Hot Gas ceramic filters, identified as KCF001 and KFC002;
 - (4) Two (2) cyclone separators, identified as CYL001 and CYC002;
 - (5) Two (2) oil condensing units, identified as COND001 and COND002;
 - (6) Two (2) oil cooler units, identified as COOL001 and COOL002;
 - (7) Two (2) oil filters, identified as OF001 and OF002; and
 - (8) Series of conveyors;
- (e) One (1) enclosed char processing system, identified as PA003, approved for construction in 2010, having a maximum throughput of twenty-two and eighty-three hundredths (22.83) tons per hour, controlled by Powerhouse Baghouse, identified as BAG001, with lime injection for HCl control, venturi wet scrubber, identified as ROTC001, and Wet Electrostatic Precipitator, identified as WET ESP, all exhausting through Stack ES001, and consisting of the following:
- (1) Two (2) char chiller/media separation units, identified as CHCOOL001 and CHCOOL002;
 - (2) Two (2) Media Separator Aspirators;
 - (3) One (1) EddyCurrent Separator and one (1) mag separator;
 - (4) One (1) Char storage bin; and
 - (5) Series of conveyors.

Note: Stack ES001 is the common exhaust stack of the above-mentioned operations.

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

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

D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

- (a) The Permittee shall pyrolyze only approved feedstock containing the following materials, unless defined as hazardous in 40 CFR: wastes consisting of animal and organic offal; animal feed wastes; asphalt; biogenic plant wastes; carbon; carpet; char, charcoal, or coals; dairy wastes; fabrics, textiles, or woven materials; fats; foams, including syrofoam; food wastes; grease; lawn wastes; leather; lime; linoleum and flexible floor files; manure; mycelium (the vegetative portion of a fungus); non-hazardous paints; latex

or latex coatings; oils; packaging; paper products; pharmaceutical wastes; plastics; polymers; resins; rubber; sugars; tar; tires; trees, diseased trees, stumps, brush, or their components; waxes; rocks, bricks, and sand; and wood.

- (b) The Permittee shall not pyrolyze items that include, but are not limited to, asbestos; ash; batteries; bottled gases; cathode ray devices; chlorinated solvents; sealed containers; explosives; fertilizers, fiberglass, rock wool insulation, glass, hazardous light bulbs, herbicides, insecticides; insulation other than foam; items classified as hazardous in 40 CFR solids or sludges; lead-based paint or coatings; liquids or sludges with a flashpoint of less than 140 degrees Fahrenheit; medical surgical wastes; metals; PCB-laden oils or solvents; poisons; propane tanks; radioactive wastes; and salts.
- (c) The Permittee shall comply with the following limits from the entire source, consisting of the landfill, waste receiving area, waste processing area, pyrolyzer areas, and char processing area:
- (1) PM10 emissions from the entire source shall not exceed 90.62 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (2) PM2.5 emissions from the entire source shall not exceed 90.62 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (3) SO2 emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (4) NOx emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (5) CO emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (6) VOC emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Note: VOC emissions from each pyrolyzer shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (7) Single HAP emissions from the entire source shall not exceed 9.98 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month, of any single HAP.
 - (8) Total HAPs emissions from the entire source shall not exceed 24.9 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month, of any combination of HAPs.

Compliance with these limits, combined with the limited potential to emit PM10, PM2.5, SO2, VOC, NOx, and HAPs from all other emission units at this source, including fugitive emissions, shall limit the source-wide total potential to emit of PM10, PM2.5, SO2, VOC, and NOx to less than 100 tons per 12 consecutive month period, each, any single HAP to less than 10 tons per 12 consecutive month period, and any combination of HAPs to less than 25 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) PM emissions from the entire source, consisting of the landfill, waste receiving area, waste processing area, pyrolyzer areas, and char processing area, shall not exceed 78.02 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

Compliance with these limits, combined with D.1.2(a) and (b), and the limited potential to emit PM from all other emission units at this source, including fugitive emissions, shall limit the source-wide total potential to emit PM to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Emission Unit Description	Control Device ID*	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
RA001	Waste Receiving Area	BAG002, with lime injection	29.68	39.7
PA001	Waste Processing Area	BAG002, with lime injection	22.38	33.3
PA002	Pyrolyzer Pyro001	BAG001, with lime injection	22.83	33.3
PA002	Pyrolyzer Pyro002	BAG001, with lime injection	22.83	33.3
PA003	Enclosed Char Processing System	BAG001, with lime injection	22.38	33.3

* Scrubber ROTC001 and WET ESP are voluntary controls and are not required in order to achieve limits.

The pounds per hour limitations were calculated using the following equations:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 VOC Limits [326 IAC 8-1-6]

In order to render 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (a) The VOC emissions from pyrolyzer Pyro001 shall not exceed 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emissions from pyrolyzer Pyro 002 shall not exceed 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with D.1.2(a) and (b), and the VOC emissions from the other emission units in the source shall limit the potential to emit VOC from each pyrolyzer to less than 25 tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Within ninety (90) days after issuance of this permit or ninety (90) days after the initial start-up, whichever is later, a Preventive Maintenance Plan is required for these facility and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4]

D.1.6 Particulate and HCl Control

- (a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the baghouses shall be in operation to control particulate matter at all times while the waste receiving, waste processing, pyrolyzer process, and char load out systems are in operation.
- (b) In order to control HCl emissions from the pyrolyzer operation, the Permittee shall inject lime into the airstream of Baghouse 001 and Baghouse 002 at all times that the process is operating.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.7 Continuous Emission Monitoring Equipment

In order to comply with Condition D.1.1, D.1.2, D.1.3, and D.1.4, the Permittee shall use the data from the following respective CEMS:

- (a) Pursuant to 326 IAC 3-5-1, the Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) on stack ES001 and related equipment, such as flowmeters to measure volumetric airflow rates, for measuring PM, SO₂, NO_x, VOC, CO and HCl emissions from the waste receiving area, waste processing area, pyrolyzer area, and char processing area, in accordance with the following:

Area	CEM Installed for the following Criteria Pollutants
Stack ES001	CEM for each of PM, SO ₂ , NO _x , CO, HCL, VOC
Pyro001	CEM for VOC
Pyro002	CEM for VOC

Each CEMS must meet all applicable performance specifications of 326 IAC 3-5-2.

- (b) The CEMS must operate and record data during all periods of operation of the affected facilities including periods of startup, shutdown, malfunction or emergency conditions, except for CEMS breakdowns, repairs, calibration checks, and zero and span adjustments.
- (c) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of

shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.

- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5, 40 CFR 60 or 40 CFR 63.
- (f) All CEMS are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.

D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.1.1(c), the Permittee shall perform PM10 and PM2.5 testing on Stack ES001, serving the waste receiving area, waste processing area, pyrolyzer system area, and enclosed char processing system not later than 180 days after final promulgation of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM2.5), signed on May 8th, 2008 or not later than 180 days after initial startup, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.
 - (1) The Permittee shall use the test results for PM, PM10, and PM2.5 to establish the relationship between PM and PM10 and between PM and PM2.5. Once established, these percentages shall be applied to the PM results from the continuous emissions monitoring system in order to determine the PM10 and PM2.5 emissions and to demonstrate compliance with Condition D.1.1(c).
 - (2) For any change in the authorized or allowable list of permitted feedstock composition, the Permittee shall repeat this test within ninety (90) days of the change and shall re-establish the relationship between PM and PM10 and also PM and PM2.5. Change in the authorized feedstock composition shall require a modification to this permit.
- (b) In order to demonstrate compliance with Condition D.1.2(b), the Permittee shall perform PM testing on Stack ES001, serving the waste receiving area, waste processing area, pyrolyzer system area, and enclosed char processing system within sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup, utilizing methods approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.
- (c) In order to confirm or verify that dioxins and furans are less than ten (10) tons per year each, the source shall perform dioxin and furans testing not later than sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup, utilizing methods approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.9 Visible Emissions Notations

- (a) Visible emission notations of the stack exhaust ES001 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If an abnormal emission is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition. Failure to take response steps accordance to Section C- Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, if operations will continue for 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the bag-house's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.11 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.2, D.1.3, and D.1.4, the Permittee shall maintain records of all PM, PM10, PM2.5, SO2, NOx, VOC, CO, and HAPs continuous emissions monitoring data, pursuant to 326 IAC 3-5-6. Records shall be complete and sufficient to establish compliance with the emission limits established in Conditions D.1.1, D.1.2, D.1.3, and D.1.4.
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a

daily record of the visible emissions from the stack ES001 exhaust controlling the waste receiving, waste processing, pyrolyzer process, and char processing areas. The Permittee shall include in its daily record when a visible emissions is not observed (e.g. the process(es) did not operate that day).

- (c) To document the compliance status with Condition D.1.9(a), the Permittee shall maintain a daily record of the pressure drop across the baghouses controlling the waste receiving, waste processing, pyrolyzer process, and char processing areas. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process(es) did not operate that day).
- (d) To document the compliance status with Condition D.1.9(b), the Permittee shall maintain a daily record of the flow rate of lime injected into the airstreams of each of the baghouses BAG001 and BAG002. The Permittee shall include in its daily record when a flow rate reading is not taken and the reason for the lack of flow rate (e.g. the process(es) did not operate that day).
- (e) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.12 Reporting Requirements

- (a) A quarterly report of CEMS exceedances shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required in this condition. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime (except for zero (0) and span checks, which shall be reported separately) shall include the following:
 - (1) Date of downtime;
 - (2) Time of commencement;
 - (3) Duration of each downtime;
 - (4) Reasons for each downtime; and
 - (5) Nature of system repairs and adjustments.

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

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) landfill, identified as Huntington City Landfill, constructed in 1970, with a maximum capacity of twenty-two thousand seven hundred sixteen (22,716) tons, or twenty thousand six hundred seven (20,607) megagrams, using no controls, and exhausting to atmosphere;

Under 40 CFR Part 60, Subpart Cc, this facility is considered and affected source.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 12-1]

E.1.1 General Provisions Relating to NSPS [326 IAC 12-2] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A-General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the landfill described in this section except when otherwise specified in 40 CFR Part 60, Subpart Cc.

E.1.2 Standards of Performance for Municipal Solid Waste [40 CFR Part 60, Subpart Cc]

Pursuant to 40 CFR Part 60, Subpart Cc, the Permittee shall comply with the provisions of the New Source Performance Standards for Municipal Solid Waste, as follows:

- (a) 40 CFR 60.30c
- (b) 40 CFR 60.31c
- (c) 40 CFR 60.33c
- (d) 40 CFR 60.34c
- (e) 40 CFR 60.35c(a)
- (f) 40 CFR 60.36c

The requirements of 40 CFR Part 60, Subpart Cc are specified in Attachment A of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

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

Source Name: Nature's Fuel
Source Address: 515 South 200 West, Huntington, Indiana 46750
Mailing Address: 432 E. Cook Road, Fort Wayne, Indiana 46825
FESOP Permit No.: 069-27596-00081

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 AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

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

Source Name: Nature's Fuel
Source Address: 515 South 200 West, Huntington, Indiana 46750
Mailing Address: 432 E. Cook Road, Fort Wayne, Indiana 46825
FESOP Permit No.: 069-27596-00081

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: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Nature's Fuel
Source Address: 515 South 200 West, Huntington, Indiana 46750
Mailing Address: 432 E. Cook Road, Fort Wayne, Indiana 46825
FESOP Permit No.: 069-27596-00081

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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 ΔNo 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: _____

Mail to: Permit Administration and Support Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Nature's Fuel
515 South 200 West
Huntington, Indiana 46750

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 Nature's Fuel 515 South 200 West, Huntington, Indiana 46750, completed construction of the plant to convert municipal solid waste to renewable energy on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on March 10, 2009 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. 069-27596-00081, Plant ID No. 69--00081 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

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)

Attachment A
NSPS for Municipal Solid Waste
40 CFR Part 60, Subpart Cc
For Nature's Fuel
Huntington, Indiana

Subpart Cc—Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills

Source: 61 FR 9919, Mar. 12, 1996, unless otherwise noted.

§ 60.30c Scope.

This subpart contains emission guidelines and compliance times for the control of certain designated pollutants from certain designated municipal solid waste landfills in accordance with section 111(d) of the Act and subpart B.

§ 60.31c Definitions.

Terms used but not defined in this subpart have the meaning given them in the Act and in subparts A, B, and WWW of this part.

Municipal solid waste landfill or *MSW landfill* means an entire disposal facility in a contiguous geographical space where household waste is placed in or on land. An MSW landfill may also receive other types of RCRA Subtitle D wastes such as commercial solid waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial solid waste. Portions of an MSW landfill may be separated by access roads. An MSW landfill may be publicly or privately owned. An MSW landfill may be a new MSW landfill, an existing MSW landfill or a lateral expansion.

§ 60.32c Designated facilities.

(a) The designated facility to which the guidelines apply is each existing MSW landfill for which construction, reconstruction or modification was commenced before May 30, 1991.

(b) Physical or operational changes made to an existing MSW landfill solely to comply with an emission guideline are not considered a modification or reconstruction and would not subject an existing MSW landfill to the requirements of subpart WWW [see §60.750 of subpart WWW].

(c) For purposes of obtaining an operating permit under title V of the Act, the owner or operator of a MSW landfill subject to this subpart with a design capacity less than 2.5 million megagrams or 2.5 million cubic meters is not subject to the requirement to obtain an operating permit for the landfill under part 70 or 71 of this chapter, unless the landfill is otherwise subject to either part 70 or 71. For purposes of submitting a timely application for an operating permit under part 70 or 71, the owner or operator of a MSW landfill subject to this subpart with a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters on the effective date of EPA approval of the State's program under section 111(d) of the Act, and not otherwise subject to either part 70 or 71, becomes subject to the requirements of §§70.5(a)(1)(i) or 71.5(a)(1)(i) of this chapter 90 days after the effective date of such 111(d) program approval, even if the design capacity report is submitted earlier.

(d) When a MSW landfill subject to this subpart is closed, the owner or operator is no longer subject to the requirement to maintain an operating permit under part 70 or 71 of this chapter for the landfill if the landfill is not otherwise subject to the requirements of either part 70 or 71 and if either of the following conditions are met.

(1) The landfill was never subject to the requirement for a control system under §60.33c(c) of this subpart; or

(2) The owner or operator meets the conditions for control system removal specified in §60.752(b)(2)(v) of subpart WWW.

[61 FR 9919, Mar. 12, 1996, as amended at 63 FR 32750, June 16, 1998]

§ 60.33c Emission guidelines for municipal solid waste landfill emissions.

(a) For approval, a State plan shall include control of MSW landfill emissions at each MSW landfill meeting the following three conditions:

(1) The landfill has accepted waste at any time since November 8, 1987, or has additional design capacity available for future waste deposition;

(2) The landfill has a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters. The landfill may calculate design capacity in either megagrams or cubic meters for comparison with the exemption values. Any density conversions shall be documented and submitted with the design capacity report; and

(3) The landfill has a nonmethane organic compound emission rate of 50 megagrams per year or more.

(b) For approval, a State plan shall include the installation of a collection and control system meeting the conditions provided in §60.752(b)(2)(ii) of this part at each MSW landfill meeting the conditions in paragraph (a) of this section. The State plan shall include a process for State review and approval of the site-specific design plans for the gas collection and control system(s).

(c) For approval, a State plan shall include provisions for the control of collected MSW landfill emissions through the use of control devices meeting the requirements of paragraph (c)(1), (2), or (3) of this section, except as provided in §60.24.

(1) An open flare designed and operated in accordance with the parameters established in §60.18; or

(2) A control system designed and operated to reduce NMOC by 98 weight percent; or

(3) An enclosed combustor designed and operated to reduce the outlet NMOC concentration to 20 parts per million as hexane by volume, dry basis at 3 percent oxygen, or less.

(d) For approval, a State plan shall require each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume to submit an initial design capacity report to the Administrator as provided in §60.757(a)(2) of subpart WWW by the date specified in §60.35c of this subpart. The landfill may calculate design capacity in either megagrams or cubic meters for comparison with the exemption values. Any density conversions shall be documented and submitted with the report. Submittal of the initial design capacity report shall fulfill the requirements of this subpart except as provided in paragraph (d)(1) and (d)(2) of this section.

(1) The owner or operator shall submit an amended design capacity report as provided in §60.757(a)(3) of subpart WWW. [Guidance: Note that if the design capacity increase is the result of a modification, as defined in §60.751 of subpart WWW, that was commenced on or after May 30, 1991, the landfill will become subject to subpart WWW instead of this subpart. If the design capacity increase is the result of a change in operating practices, density, or some other change that is not a modification, the landfill remains subject to this subpart.]

(2) When an increase in the maximum design capacity of a landfill with an initial design capacity less than 2.5 million megagrams or 2.5 million cubic meters results in a revised maximum design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, the owner or operator shall comply with paragraph (e) of this section.

(e) For approval, a State plan shall require each owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters to either install a collection and control system

as provided in paragraph (b) of this section and §60.752(b)(2) of subpart WWW or calculate an initial NMOC emission rate for the landfill using the procedures specified in §60.34c of this subpart and §60.754 of subpart WWW. The NMOC emission rate shall be recalculated annually, except as provided in §60.757(b)(1)(ii) of subpart WWW.

(1) If the calculated NMOC emission rate is less than 50 megagrams per year, the owner or operator shall:

(i) Submit an annual emission report, except as provided for in §60.757(b)(1)(ii); and

(ii) Recalculate the NMOC emission rate annually using the procedures specified in §60.754(a)(1) of subpart WWW until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, or the landfill is closed.

(2)(i) If the NMOC emission rate, upon initial calculation or annual recalculation required in paragraph (e)(1)(ii) of this section, is equal to or greater than 50 megagrams per year, the owner or operator shall install a collection and control system as provided in paragraph (b) of this section and §60.752(b)(2) of subpart WWW.

(ii) If the landfill is permanently closed, a closure notification shall be submitted to the Administrator as provided in §60.35c of this subpart and §60.757(d) of subpart WWW.

[61 FR 9919, Mar. 12, 1996, as amended at 63 FR 32750, June 16, 1998; 64 FR 9261, Feb. 24, 1999]

§ 60.34c Test methods and procedures.

For approval, a State plan shall include provisions for: the calculation of the landfill NMOC emission rate listed in §60.754, as applicable, to determine whether the landfill meets the condition in §60.33c(a)(3); the operational standards in §60.753; the compliance provisions in §60.755; and the monitoring provisions in §60.756.

§ 60.35c Reporting and recordkeeping guidelines.

For approval, a State plan shall include the recordkeeping and reporting provisions listed in §§60.757 and 60.758, as applicable, except as provided under §60.24.

(a) For existing MSW landfills subject to this subpart the initial design capacity report shall be submitted no later than 90 days after the effective date of EPA approval of the State's plan under section 111(d) of the Act.

(b) For existing MSW landfills covered by this subpart with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, the initial NMOC emission rate report shall be submitted no later than 90 days after the effective date of EPA approval of the State's plan under section 111(d) of the Act.

[61 FR 9919, Mar. 12, 1996, as amended at 64 FR 9262, Feb. 24, 1999]

§ 60.36c Compliance times.

(a) Except as provided for under paragraph (b) of this section, planning, awarding of contracts, and installation of MSW landfill air emission collection and control equipment capable of meeting the emission guidelines established under §60.33c shall be accomplished within 30 months after the date the initial NMOC emission rate report shows NMOC emissions equal or exceed 50 megagrams per year.

(b) For each existing MSW landfill meeting the conditions in §60.33c(a)(1) and §60.33c(a)(2) whose NMOC emission rate is less than 50 megagrams per year on the effective date of the State emission standard, installation of collection and control systems capable of meeting emission guidelines in §60.33c shall be accomplished within 30 months of the date when the condition in §60.33c(a)(3) is met (i.e., the date of the first annual nonmethane organic compounds emission rate which equals or exceeds 50 megagrams per year).

[61 FR 9919, Mar. 12, 1996, as amended at 63 FR 32750, June 16, 1998]

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

Addendum to the Technical Support Document (ATSD) for a
New Source Construction and Federally Enforceable State Operating Permit
(FESOP)

Source Background and Description

Source Name:	Nature's Fuel
Source Location:	515 South 300 West, Huntington, Indiana 46750
County:	Huntington
SIC Code:	2869
Operation Permit No.:	F 069-27596-00081
Permit Reviewer:	Jack Harmon

On April 5, 2010, the Office of Air Quality (OAQ) had a notice published in the Herald Press, Huntington, Indiana, stating that Nature's Fuel had applied for a New Source Construction and Federally Enforceable State Operating Permit (FESOP) to construct and operate a new stationary facility to convert municipal solid waste to renewable energy. The notice also stated that the OAQ proposed to issue a New Source Construction and Federally Enforceable State Operating Permit (FESOP) for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On May 5, 2010, Colin C. O'Brien, Staff Attorney, Clean Air Project, on behalf of the Natural Resources Defense Council (NRDC) submitted comments to IDEM, OAQ, via electronic mail (e-mail) on the draft New Source Construction and Federally Enforceable State Operating Permit (FESOP).

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

NRDC objects to the Draft Permit on the grounds that Nature's Fuel, a biofuel production facility, should be classified as a "chemical process plant" and a "fuel conversion plant" and, therefore, is one of the twenty-eight source categories. As one of the twenty-eight source categories, it would require that fugitive dust emissions be counted in the determination of PSD applicability and would also change the threshold for particulate matter to 100 tons per year of particulate matter (PM) limitation established in 326 IAC 2-2.

Response to Comment 1:

In FESOP Draft Permit No. 069-27596-00081, this source was determined to be not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. However, according to an U.S. EPA memo titled, "Classification of the Bardstown Fuel Alcohol Company under PSD," which was written on August 21, 1981 and an U.S. EPA applicability determination request for the Mecklenburg County Department of Environmental Protection on August 8, 1997, sources that operate under Standard Industrial Classification Major Group 28 - Chemicals and Allied Products Establishments are considered chemical process plants (Note: while wet and dry corn milling facilities that produce ethanol for fuel operate under SIC Code 2869, they have been specifically exempted from these requirements and are not considered one of the twenty-eight source categories, pursuant to the U.S. EPA). Therefore, since this source operates under SIC Code 2869 and does not produce ethanol, it is classified as a chemical process plant and it is considered one of the

twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

However, this source is not one of the twenty-eight (28) listed source categories as a fuel conversion plant because based on U.S. EPA correspondence to the South Carolina Department of Health and Environmental Services on June 4, 2007. To be considered a fuel conversion plant, the conversion process must involve a fossil fuel. Therefore, based on U.S EPA guidance this source is not considered a fuel conversion plant, since it converts biomass to a liquid state.

The following are changes resulting from this re-classification:

- (a) The following table represents the revised Potential to Emit After Issuance of the FESOP, showing revised limits and emissions counting fugitive emissions.

PTE of the Entire Source After Issuance of the FESOP

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC***	CO	Total HAPs	Worst ** Single HAP
Landfill	--	--	--	0.00	0.00	0.00	0.00	.0170	.0664 (Ethane)
One (1) pyrolyzer, identified as Pyro001, enclosed, controlled by Baghouse BAG001,						<25.0			
One (1) pyrolyzer, identified as Pyro002, enclosed controlled by Baghouse BAG001	78.02 245.0	90.62 95.0	90.62 95.0	95.0	95.0	<25.0	95.0	24.9	9.98
Waste Receiving Area, RA001, Waste Processing Area, PA001, all controlled by baghouse BAG002; Dryer/burner MAXB001, (combustion); Char Processing System, controlled by Baghouse BAG001						45.00			
Fugitive Emissions****	16.98	4.38	4.38						
Total PTE of Entire Source	95.0 245.0	95.0	95.0	95.0	95.0	95.0	95.0	24.9	9.98
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100 250	100 250	100 250	100 250	100 250	100 250	100 250	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".
** HCl emissions to be limited to less than 10 tons/yr by using lime injection into the airstream to each baghouse, and by limiting the type of feedstock pyrolyzed.
***VOC emissions to be limited to <25 tons per year for each pyrolyzer in order to render the requirements of 326 IAC 8-1-6 not applicable.
**** **Fugitive Emissions are the total of unpaved roads fugitive dust and the Huntington City Landfill fugitive dust. Detailed calculations are shown in App A of this ATSD.**

The table below summarizes the potential to emit of the entire source after the issuance of the FESOP, reflecting all limits and fugitive emissions. Any control equipment is considered federally enforceable only after the issuance of

this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC***	CO	Total HAPs	Worst ** Single HAP
Landfill	--	--	--	0.00	0.00	0.00	0.00	.0170	.0664 (Ethane)
One (1) pyrolyzer, identified as Pyro001, enclosed, controlled by Baghouse BAG001,	78.02	90.62	90.62	95.0	95.0	<25.0	95.0	24.9	9.98
One (1) pyrolyzer, identified as Pyro002, enclosed controlled by Baghouse BAG001						<25.0			
Waste Receiving Area, RA001, Waste Processing Area, PA001, all controlled by baghouse BAG002; Dryer/burner MAXB001, (combustion); Char Processing System, controlled by Baghouse BAG001						45.00			
Fugitive Emissions****	16.98	4.38	4.38						
Total PTE of Entire Source	95.0	95.0	95.0	95.0	95.0	95.0	95.0	24.9	9.98
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	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". ** HCl emissions to be limited to less than 10 tons/yr by using lime injection into the airstream to each baghouse, and by limiting the type of feedstock pyrolyzed. ***VOC emissions to be limited to <25 tons per year for each pyrolyzer in order to render the requirements of 326 IAC 8-1-6 not applicable. **** Fugitive Emissions are the total of unpaved roads fugitive dust and the Huntington City Landfill fugitive dust. Detailed calculations are shown in App A of this ATSD.									

(b) This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is limited to less than 100 tons per year and the potential to emit all other attainment regulated pollutants are less than 100 tons per year, and this source is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) Due to the change in classification as outlined above, a new review of Federal Rule applicability was conducted.

(1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chemical Manufacturing Area Sources, 40 CFR 63.11494, Subpart VVVVVV, are not included for this source because no HAPs as listed in Table 1 to this subpart are present in the process fluids at concentrations greater than 0.1 percent for carcinogens, as defined by the

Occupational Safety and Health Administration at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. Based on the "Nature's Fuel Bio-Oil" material safety data sheet the oil contains less than 0.1% of any metal compounds. Therefore, the requirements of 40 CFR 63 Subpart VVVVVV do not apply.

- (2) There are no other new National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included as the result of this change.

- (d) The permit has been changed as follows, with deleted language as ~~strikeouts~~ and new language **bolded**:

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

The Permittee owns and operates a stationary plant to convert municipal solid waste to renewable energy.

Source Status: Federally Enforceable State Operating Permit Program
Minor Source, under PSD and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act
~~Not~~ 1 of 28 Source Categories

D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

(a) ---

- (c) The Permittee shall comply with the following limits from the entire source, consisting of the landfill, waste receiving area, waste processing area, pyrolyzer areas, and char processing area:

- (1) PM10 emissions from the entire source shall not exceed ~~95.0~~ **90.62** tons per twelve (12) consecutive month period with compliance determined at the end of each month;
- (2) PM2.5 emissions from the entire source shall not exceed ~~95.0~~ **90.62** tons per twelve (12) consecutive month period with compliance determined at the end of each month;
- (3) ---

Compliance with these limits, combined with the limited potential to emit PM10, PM2.5, SO2, VOC, NOx, and HAPs from all other emission units at this source, **including fugitive emissions**, shall limit the source-wide total potential to emit of PM10, PM2.5, SO2, VOC, and NOx to less than 100 tons per 12 consecutive month period, each, any single HAP to less than 10 tons per 12 consecutive month period, and any combination of HAPs to less than 25 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) PM emissions from the entire source, consisting of the landfill, waste receiving area, waste processing area, pyrolyzer areas, and char processing area, shall not exceed ~~245~~ **78.02** tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

Compliance with these limits, combined with D.1.2(a) and (b), and the limited potential to emit PM from all other emission units at this source, **including fugitive emissions**, shall limit the source-wide total potential to emit PM to less than ~~250~~ **100** tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

IDEM Contact

- (a) Questions regarding this proposed FESOP can be directed to Jack Harmon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (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.idem.in.gov

Appendix A: Emissions Calculations Entire Source Emission Unit Summary

Company Name: Nature's Fuel
Address City IN Zip: 515 South 300 West, Huntington, Indiana 46750

Permit No.: F 069-27596-00081
Reviewer: Jack Harmon
Date: May 10, 2010

Uncontrolled Potential Emissions (tons/year)										
Category	Pollutant	Emissions Generating Activity								TOTAL***
		Pyrolyzer Process Area	Waste Receiving Area	Char Processing System	Pyrolyzer Combustion	Waste Combustion	Unpaved Roads Fugitives	Landfill Emissions and Fugitives		
					MAXB002.00	MAXB001				
Criteria Pollutants	PM	343.00	5256.00	5256.00	0.18	0.09	15.14	1.84	10855.27	
	PM10	343.00	5256.00	5256.00	0.60	0.20	3.91	0.47	10855.80	
	PM2.5	343.00	5256.00	5256.00	0.60	0.20	3.91	0.47	10855.80	
	SO2	323.00	0.00	0.00	0.18	0.09	0.00	0.00	323.27	
	NOx	316.00	0.00	0.00	8.8	3.68	0.00	0.00	328.48	
	VOC	0.00	0.00	0.00	0.4	0.1	0.00	8.04E-02	0.50	
	CO	29.90	0.00	0.00	7.4	1.8	0.00	9.73E-03	39.10	
Hazardous Air Pollutants	Benzene				9.20E-05	9.20E-05		**	1.84E-04	
	Chlorobenzene				5.26E-05	5.26E-05			1.05E-04	
	Formaldehyde				6.29E-03	6.29E-03			1.26E-02	
	Hexane				7.88E-02	7.88E-02			1.58E-01	
	Toluene				1.49E-04	1.49E-04			2.98E-04	
	Arsenic	6.69E-02								
	Cadmium	2.41E-01			4.82E-05	4.82E-05			2.41E-01	
	Chromium	3.31E-01			6.13E-05	6.13E-05			3.31E-01	
	Dioxin	3.31E-06							3.31E-06	
	Hydrogen Chloride	2.15E+02							2.15E+02	
	Lead	2.82E-01			2.19E-05	2.19E-05			2.82E-01	
	Nickel	5.52E-01			9.20E-05	9.20E-05				
	Mercury	5.60E-01								
	Manganese				1.66E-05	1.66E-05				
	Totals	2.17E+02			8.56E-02	8.56E-02		1.70E-01	2.17E+02	
									2.15E+02	

Total emissions based on rated capacity at 8,760 hours/year. HCl
 * - Bio Gas and Natural Gas emissions both calculated and used worst case scenario in this summary. Calculations for Natural Gas shown page 5 of App A.
 ** For Landfill HAPs, see detail Page 10 of 11 Appendix A
 *** Totals do not include fugitives toward emissions

Pyrolysis process utilizes baghouse for control at 99.5% efficiency
 Char load out system utilizes baghouse for control at 99.5% efficiency.
 BioGas gasification process utilizes scrubbers for control at 99.5% efficiency
 Natural Gas gasification process utilizes scrubbers and baghouse for control at 99.5% efficiency
 Storage Piles will be enclosed in a building and will utilize baghouse dust collection for control at 99.5% efficiency; therefore are not considered fugitive and are already included in Waste Receiving calculation.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								Total HAPs	Worst** Single HAP 0664 (Ethane)
	PM	PM10*	PM2.5	SO ₂	NOx	VOC***	CO			
Landfill	--	--	--	0.00	0.00	0.00	0.00	0.170		
One (1) pyrolyzer, identified as Pyro001, enclosed, controlled by Baghouse BAG001,						<25.0				
One (1) pyrolyzer, identified as Pyro002, enclosed controlled by Baghouse BAG001	78.02 245.0	90.62 96.0	90.62 96.0	95.0	95.0	<25.0	95.0	24.9	9.98	
Waste Receiving Area, RA001, Waste Processing Area, PA001, all controlled by baghouse BAG002; Dryer/burner MAXB001, (combustion); Char Processing System, controlled by Baghouse BAG001						45.00				
Fugitive Emissions****	16.98	4.38	4.38							
Total PTE of Entire Source	95.0 245.0	95.0	95.0	95.0	95.0	95.0	95.0	24.9	9.98	
Title V Major Source Thresholds	100 NA	100	100	100	100	100	100	25	10	
PSD Major Source Thresholds	100 250	100 250	100 250	100 250	100 250	100 250	100 250	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".
 ** HCl emissions to be limited to less than 10 tons/yr by using lime injection into the airstream to each baghouse, and by limiting the type of feedstock pyrolyzed.
 ***VOC emissions to be limited to <25 tons per year for each pyrolyzer in order to render the requirements of 326 IAC 8-1-6 not applicable.
 **** Fugitive Emissions are the total of Unpaved roads fugitive dust and the Huntington City Landfill fugitive dust. Detailed calculations are shown in App A of this ATSD.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Nature's Fuel
Source Location:	515 South 300 West, Huntington, Indiana 46750
County:	Huntington
SIC Code:	2869
Operation Permit No.:	F 069-27596-00081
Permit Reviewer:	Jack Harmon

On March 10, 2009, the Office of Air Quality (OAQ) received an application from Nature's Fuel related to the construction and operation of a new source to convert municipal solid waste to renewable energy.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Huntington County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, 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	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Huntington County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the final promulgation of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.

- (c) Other Criteria Pollutants
Huntington County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, because it is not a chemical production facility, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Nature's Fuel on March 10, 2009, relating to the construction and operation of a new source to convert municipal solid waste to renewable energy. The new source will combine with an existing unit, Huntington City Landfill, and will operate under one permit. The Huntington City Landfill, constructed in 1970, is exempt from permit requirements because its annual volume of twenty thousand seven hundred sixteen (20,607) megagrams is below the required permit level of two million five hundred thousand (2,500,000) megagrams per year. The landfill will be listed and permitted as one (1) emission unit, and the emissions from it will be shown in the Calculations, shown in Appendix A of this technical support document.

The following is a list of the new emission units and pollution control devices:

- (a) One (1) landfill, identified as Huntington City Landfill, constructed in 1970, with a maximum capacity of twenty-two thousand seven hundred sixteen (22,716) tons, or twenty thousand six hundred seven (20,607) megagrams, using no controls, and exhausting to atmosphere;

Under 40 CFR Part 60, Subpart Cc, this facility is considered and affected source.

- (b) One (1) Waste Receiving Area, identified as RA001, enclosed, approved of construction in 2010, with a maximum throughput capacity of twenty-nine and sixty-eight hundredths (29.68) tons per hour, all enclosed, controlled by Emissions Control Baghouse BAG002, with lime injection for HCl control, and exhausting through Stack ES001, consisting of the following:

- (1) Feedstock storage pile;
- (2) Solidification pad; and
- (3) Wood grinder, electric-powered, up to 700HP, and
- (4) Storage pad;

- (c) One (1) Waste Processing Area, identified as PA001, enclosed, approved for construction in 2010, with a maximum throughput capacity of twenty-two and eighty-three hundredths (22.83) tons per hour, all enclosed, controlled by Emissions Control Baghouse BAG002, with lime injection for HCl control, and exhausting through Stack ES001, consisting of the following:

- (1) Two (2) rotary dryers, utilizing one (1) natural gas-fired and bio gas-fired (process gas) burners, identified as MAXB001, with a maximum heat input capacity of five million Btu/hr (5 MMBtu/hr);
- (2) Two (2) Flail shredders;

- (3) Five (5) shear shredders;
 - (4) One (1) Hammermill shredder;
 - (5) Two (2) Trommel sizing screens and one (1) Finger screen;
 - (6) Two (2) Air classifier screens;
 - (7) Several Reject and Waste Metal holding bins, several magnetic separators, and a series of belt conveyors; and
 - (8) One (1) Eddy Current Separator.
- (d) Two (2) Pyrolyzer Systems, both enclosed, collectively identified as PA002, approved for construction in 2010, having a combined maximum throughput of twenty-two and eighty-three hundredths (22.83) tons per hour, with wet Venturi Scrubber, identified as ROTC001; Powerhouse Baghouse, identified as BAG001, with lime injection for HCl control; and Wet Electrostatic Precipitator, identified as WET ESP, all exhausting through Stack ES001, and consisting of the following:
- (1) One (1) pyrolyzer system, identified as Pyro001, enclosed, having a maximum throughput of eleven and four hundred fifteen thousandths (11.415) tons per hour, utilizing one (1) natural gas-fired and bio gas-fired (process gas) burner, identified as MAXB003 with a maximum heat input capacity of ten million Btu/hr (10MMBtu/hr).
 - (2) One (1) pyrolyzer system, identified as Pyro002, enclosed, having a maximum throughput of eleven and four hundred fifteen thousandths (11.415) tons per hour, utilizing one (1) natural gas-fired and bio gas-fired (process gas) burner, identified as MAXB002 with a maximum heat input capacity of ten million Btu/hr (10MMBtu/hr).
 - (3) Two (2) Hot Gas ceramic filters, identified as KCF001 and KFC002;
 - (4) Two (2) cyclone separators, identified as CYL001 and CYC002;
 - (5) Two (2) oil condensing units, identified as COND001 and COND002;
 - (6) Two (2) oil cooler units, identified as COOL001 and COOL002;
 - (7) Two (2) oil filters, identified as OF001 and OF002; and
 - (8) Series of conveyors;
- (e) One (1) enclosed char processing system, identified as PA003, approved for construction in 2010, having a maximum throughput of twenty-two and eighty-three hundredths (22.83) tons per hour, controlled by Powerhouse Baghouse, identified as BAG001, with lime injection for HCl control, venturi wet scrubber, identified as ROTC001, and Wet Electrostatic Precipitator, identified as WET ESP, all exhausting through Stack ES001, and consisting of the following:
- (1) Two (2) char chiller/media separation units, identified as CHCOOL001 and CHCOOL002;
 - (2) Two (2) Media Separator Aspirators;
 - (3) One (1) EddyCurrent Separator and one (1) mag separator;
 - (4) One (1) Char storage bin; and

(5) Series of conveyors.

The following is a list of the insignificant activities:

- (a) Twenty (20) above-ground bio-oil storage tanks, identified as PRBT001 through PRBT010, and STBT001 through STBT010, each having a maximum storage capacity of thirty thousand (30,000) gallons;
- (b) Twelve (12) raw materials storage silos; and
- (c) Fugitive Dust sources, consisting of the following:
 - (1) Paved roads and unpaved roads.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	10855.27
PM10 ⁽¹⁾	10855.80
PM2.5	10885.80
SO ₂	323.27
NO _x	328.48
VOC	0.50
CO	39.10

(1) 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".

HAPs	Potential To Emit (tons/year)
Hydrogen Chloride	215.00
Hexane	0.158
Ethane	.0664
TOTAL HAPs	217.0

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM10, PM2.5, SO2, and NOx is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, 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 FESOP (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC***	CO	Total HAPs	Worst ** Single HAP
Landfill	--	--	--	0.00	0.00	0.00	0.00	.0170	.0664 (Ethane)
One (1) pyrolyzer, identified as Pyro001, enclosed, controlled by Baghouse BAG001,	245.0	95.0	95.0	95.0	95.0	<25.0	95.0	24.9	9.98
One (1) pyrolyzer, identified as Pyro002, enclosed controlled by Baghouse BAG001						<25.0			
Waste Receiving Area, RA001, Waste Processing Area, PA001, all controlled by baghouse BAG002; Dryer/burner MAXB001, (combustion); Char Processing System, controlled by Baghouse BAG001						45.00			
Total PTE of Entire Source	245.0	95.0	95.0	95.0	95.0	95.0	95.0	24.9	9.98
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
<p>* 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".</p> <p>** HCl emissions to be limited to less than 10 tons/yr by using lime injection into the airstream to each baghouse, and by limiting the type of feedstock pyrolyzed.</p> <p>***VOC emissions to be limited to <25 tons per year for each pyrolyzer in order to render the requirements of 326 IAC 8-1-6 not applicable.</p>									

- (a) FESOP Status
This new source is not a Title V major stationary source, because the potential to emit criteria

pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP). Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

Under the current broad definition of municipal solid waste, there was concern about the variability of the incoming raw materials, and, therefore, the difficulty in controlling the emissions. Therefore, it was necessary to develop a specific list of what may and what may not be processed, in order to control the output of emissions. Pursuant to 326 IAC 2-8-4, and in order to maintain the consistency of, and reduce the variability of, the material used, the following shall apply:

- (1) The source shall pyrolyze only approved feedstock containing the following materials, unless defined as hazardous in 40 CFR: wastes consisting of animal and organic offal; animal feed wastes; asphalt; biogenic plant wastes; carbon; carpet; char, charcoal, or coals; dairy wastes; fabrics, textiles, or woven materials; fats; foams, including syrofoam; food wastes; grease; lawn wastes; leather; lime; linoleum and flexible floor files; manure; mycelium (the vegetative portion of a fungus); non-hazardous paints; latex or latex coatings; oils; packaging; paper products; pharmaceutical wastes; plastics; polymers; resins; rubber; sugars; tar; tires; trees, diseased trees, stumps, brush, or their components; waxes; rocks, bricks, and sand; and wood.
- (2) The source shall not pyrolyze items that include, but are not limited to, asbestos; ash; batteries; bottled gases; cathode ray devices; chlorinated solvents; sealed containers; explosives; fertilizers, fiberglass, rock wool insulation, glass, hazardous light bulbs, herbicides, insecticides; insulation other than foam; items classified as hazardous in 40 CFR solids or sludges; lead-based paint or coatings; liquids or sludges with a flashpoint of less than 140 degrees Fahrenheit; medical surgical wastes; metals; PCB-laden oils or solvents; poisons; propane tanks; radioactive wastes; and salts.
- (3) Since the source has opted to use Continuous Emissions Monitoring Systems, the limits will be specified as follows, and includes emissions from Insignificant Activities:
 - (a) PM10 emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (b) PM2.5 emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (c) SO2 emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (d) NOx emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (e) CO emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
 - (f) VOC emissions from the entire source shall not exceed 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Note: VOC emissions from each pyrolyzer shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month;

- (g) HAPs emissions from the entire source shall not exceed 9.98 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, of any single HAP, and 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, for any combination of HAPs.*

*Note: Scrubber ROTC001 and WET ESP are voluntary controls and are not required in order to achieve limits, because the limiting factor is the HCl emissions to be limited to less than 10 tons/yr.

Compliance with these limits shall render the requirements of 326 IAC 2-7, 326 IAC 2-2, and 326 IAC 2-4.1 not applicable. The source has opted to use Continuous Emissions Monitoring in order to comply with these limits.

- (b) PSD Minor Source

This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit all criteria pollutants is limited to less than 250 tons per year and the potential to emit all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Emissions Guidelines and Compliance Times for Municipal Solid Waste, 40 CFR 60, Subpart Cc (326 IAC 12), are included in the permit, since the landfill was commenced prior to May 30, 1992. Therefore the source is subject to the following requirements of 40 CFR Part 60, Subpart Cc:
- (1) 40 CFR 60.30c
 - (2) 40 CFR 60.31c
 - (3) 40 CFR 60.33c
 - (4) 40 CFR 60.34c
 - (5) 40 CFR 60.35c(a)
 - (6) 40 CFR 60.36c
- (b) The requirements of the following New Source Performance Standards were evaluated for this source, and found to not be applicable to this source:
- (1) 40 CFR 60, Subpart Eb, New Source Performance Standards for Municipal Waste Combustors;
 - (2) 40 CFR 60, Subpart AAAA, New Source Performance Standards for Small Municipal Waste Combustors;
 - (3) 40 CFR 60, Subpart CCCC, New Source Performance Standards for Commercial and Industrial Solid Waste Incineration Units;
 - (4) 40 CFR 60, Subpart EEEE, New Source Performance Standards for Other Solid Waste Incinerators; and
 - (5) 40 CFR 60, Subpart Kb, New Source Performance Standards for Volatile Organic Liquid Storage Vessels, since the true vapor pressure is less than 15 kPa.

The emission units at this source do not meet with definition of waste combustors or incinerators, as defined in each of the New Source Performance Standards described above. Therefore, the source is not subject to these requirements.

- (c) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the following National Emission Standards for Hazardous Air Pollutants were evaluated for this source, and found to not be applicable to this source:
- (1) 40 CFR 63, Subpart AAAA do not apply because the capacity of the landfill is less than 2.5 million megagrams, and is not colocated with a major source.
 - (2) 40 CFR 63, Subpart CC, National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries do not apply because the source does not meet with definition of a petroleum refinery;
 - (3) 40 CFR 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants for Oil Production Facilities do not apply because the source does not meet with definition of an oil production facility;
 - (4) 40 CFR 63, Subpart EEE, National Emission Standards for Hazardous Air Pollutants for Hazardous Waste Combustors do not apply because the source does not meet with definition of Hazardous Waste Combustors;
 - (5) 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines do not apply because the source does not have any reciprocating internal combustion engines; and
 - (6) 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Process Heaters does not apply because the rule has been vacated.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (f) 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 entire source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (1) PM emissions from the entire source shall not exceed 245.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, shall limit the source-wide total potential to emit PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable. The source has opted to use Continuous Emissions Monitoring in order to comply with these limits.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new source is greater than ten (10) tons per year for any single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 shall apply.
- (d) 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.
- (e) 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 forty percent (40%) 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.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved and unpaved roads have the potential to emit fugitive particulate emissions. 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the paved and unpaved roads have potential fugitive particulate emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 6-5 do not apply.
- (h) 326 IAC 7-1.1-1 (Sulfur dioxide emission limitations)
This source is not subject to the requirements of 326 IAC 7-1.1-1, because the source does not use coal or residual oil for combustion.
- (i) 326 IAC 10-1 (Nitrogen Oxides Control)
This source is not subject to 326 IAC 10-1, because the source is not located in Clark or Floyd Counties.

The following state rules are applicable to the Waste Receiving, Waste Processing, Pyrolyzer System, and Char Processing areas:

- (j) 326 IAC 3-5 (Continuous Monitoring of Emissions)
 The source has elected to install continuous monitoring systems on stack ES001 for all criteria pollutants in order to comply with limits established under 326 IAC 2-8-4. Therefore, the source is subject to the requirements of 326 IAC 3-5 (Continuous Monitoring of Emissions).

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Emission Unit Description	Control Device ID	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
RA001	Waste Receiving Area	BAG002, with lime injection	29.68	39.7
PA001	Waste Processing Area	BAG002, with lime injection	22.83	33.3
PA002	Pyrolyzer Pyro001	BAG001, with lime injection	22.83	33.3
PA002	Pyrolyzer Pyro002	BAG001, with lime injection	22.83	33.3
PA003	Enclosed Char Processing System	BAG001, with lime injection	22.83	33.3

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The baghouses shall be in operation at all times that the RA001, PA001, PA002, and PA003 units are in operation, in order to comply with these limits.

- (l) 326 IAC 8-1-6
 This source is a new source that has the uncontrolled potential to emit twenty-five (25) tons or more per year VOC, and is not subject to any other requirements of Article 8. Therefore, this source is subject to the requirements of 326 IAC 8-1-6.

In order to render 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (1) The VOC emissions from pyrolyzer Pyro001 shall not exceed 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) The VOC emissions from pyrolyzer Pyro 002 shall not exceed 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

In order to demonstrate compliance with these limits, each pyrolyzer shall have a continuous emissions monitoring (CEM) device installed to monitor VOC, even though there will also be one on stack ES001. Compliance with these limits, combined with the VOC emissions from the other emission units in the source shall limit the potential to emit VOC from the each pyrolyzer to less

than 25 tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

Landfill:

- (m) 326 IAC 8-8-1 (Municipal Solid Waste Landfills)
 This source is not subject to 326 IAC 8-8-1 because it is not located in Clark, Floyd, Lake, or Porter County.

Insignificant Activities:

- (n) 326 IAC 8-9 (Volatile Organic Storage Vessels)
 This source is not subject to 326 IAC 8-9 because it is not located in Clark, Floyd, Lake, or Porter County and each of the storage vessels have a capacity of less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-9 do not apply.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Baghouse BAG001	Visible Emissions Notation	Once per day
Baghouse BAG002	Visible Emissions Notation	Once per day

- (b) In order to demonstrate compliance with limits established under 326 IAC 2-8-4, the source has opted to install and operate Continuous Emissions Monitoring equipment on stack ES001 for PM, SO₂, NO_x, VOC, CO, and HCl, as well as one CEM unit on each of the two pyrolyzers, monitoring VOC, as follows:

- (1) Pursuant to 326 IAC 3-5-1, the Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) on stack ES001 and related equipment, such as flowmeters to measure volumetric airflow rates, for measuring PM, SO₂, NO_x, VOC, CO and HCl emissions from the waste receiving area, waste processing area, pyrolyzer area, and char processing area, in accordance with the following:

Area	CEM Installed for the following Criteria Pollutants
Stack ES001	CEM for each of PM, SO ₂ , NO _x , CO, HCL, VOC
Pyro001	CEM for VOC
Pyro002	CEM for VOC

Each CEMS must meet all applicable performance specifications of 326 IAC 3-5-2.

- (2) The CEMS must operate and record data during all periods of operation of the affected facilities including periods of startup, shutdown, malfunction or emergency conditions, except for CEMS breakdowns, repairs, calibration checks, and zero and span adjustments.
- (3) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (4) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown

of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.

- (5) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5, 40 CFR 60 or 40 CFR 63.
 - (6) All CEMS are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
 - (7) The source shall perform recordkeeping and reporting activities, meeting all applicable requirements if 326 IAC 3-5-6 and 326 IAC 3-5-7.
 - (8) The source shall install and maintain an identical continuous emissions monitoring system to meet the same specifications as outlined above, in order to ensure continuous compliance.
- (c) The testing requirements applicable to this source are as follows:
- (1) In order to demonstrate compliance with Condition D.1.1(c), the Permittee shall perform PM10 and PM2.5 testing on Stack ES001, serving the waste receiving area, waste processing area, pyrolyzer system area, and enclosed char processing system not later than 180 days after final promulgation of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM2.5), signed on May 8th, 2008 or not later than 180 days after initial startup, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.
 - (i) The Permittee shall use the test results for PM, PM10, and PM2.5 to establish the relationship between PM and PM10 and between PM and PM2.5. Once established, these percentages shall be applied to the PM results from the continuous emissions monitoring system in order to determine the PM10 and PM2.5 emissions and to demonstrate compliance with Condition D.1.1(c).
 - (ii) For any change in the authorized or allowable list of permitted feedstock composition, the Permittee shall repeat this test within ninety (90) days of the change and shall re-establish the relationship between PM and PM10 and also PM and PM2.5. Change in the authorized feedstock composition shall require a modification to this permit.
 - (2) In order to demonstrate compliance with Condition D.1.2(b), the Permittee shall perform PM testing on the waste receiving area, waste processing area, pyrolyzer system area, and enclosed char processing system within sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup, utilizing methods approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

- (3) In order to confirm or verify that dioxins and furans are less than ten (10) tons per year each, the source shall perform dioxin and furans testing not later than sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup, utilizing methods approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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 March 10, 2009.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. 069-27596-00081. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jack Harmon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (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.idem.in.gov

Appendix A: Emissions Calculations Entire Source Emission Unit Summary

Company Name: Nature's Fuel
Address City IN Zip: 515 South 300 West, Huntington, Indiana 46750

Permit No.: F 069-27596-00081
Reviewer: Jack Harmon
Date: May 10, 2010

Uncontrolled Potential Emissions (tons/year)									
Emissions Generating Activity									
Category	Pollutant	Pyrolyzer Process Area	Waste Receiving Waste Processing Areas	Char Processing System	Pyrolyzer Process Combustion MAXB002,003	Waste Process Combustion MAXB001	Unpaved Roads Fugitives Process	Landfill Emissions and Fugitives	TOTAL***
		Criteria Pollutants	PM	343.00	5256.00	5256.00	0.18	0.09	
	PM10	343.00	5256.00	5256.00	0.60	0.20	3.91	0.47	10855.80
	PM2.5	343.00	5256.00	5256.00	0.60	0.20	3.91	0.47	10855.80
	SO2	323.00	0.00	0.00	0.18	0.09	0.00	0.00	323.27
	NOx	316.00	0.00	0.00	8.8	3.68	0.00	0.00	328.48
	VOC	0.00	0.00	0.00	0.4	0.1	0.00	8.04E-02	0.50
	CO	29.90	0.00	0.00	7.4	1.8	0.00	9.73E-03	39.10
Hazardous Air Pollutants	Benzene				9.20E-05	9.20E-05		**	1.84E-04
	Dichlorobenzene				5.26E-05	5.26E-05			1.05E-04
	Formaldehyde				6.29E-03	6.29E-03			1.26E-02
	Hexane				7.88E-02	7.88E-02			1.58E-01
	Toluene				1.49E-04	1.49E-04			2.98E-04
	Arsenic	6.69E-02							
	Cadmium	2.41E-01			4.82E-05	4.82E-05			2.41E-01
	Chromium	3.31E-01			6.13E-05	6.13E-05			3.31E-01
	Dioxin	3.31E-06							3.31E-06
	Hydrogen Chloride	2.15E+02							2.15E+02
	Lead	2.82E-01			2.19E-05	2.19E-05			2.82E-01
	Nickel	5.52E-01			9.20E-05	9.20E-05			
	Mercury	5.60E-01							
	Manganese				1.66E-05	1.66E-05			
	Totals	2.17E+02			8.56E-02	8.56E-02		1.70E-01	2.17E+02
									2.15E+02

Total emissions based on rated capacity at 8,760 hours/year. HCl

* - Bio Gas and Natural Gas emissions both calculated and used worst case scenario in this summary. Calculations for Natural Gas shown page 5 of App A.

** For Landfill HAPs, see detail Page 10 of 11 Appendix A

*** Totals do not include fugitives toward emissions

Pyrolysis process utilizes baghouse for control at 99.5% efficiency
 Char load out system utilizes baghouse for control at 99.5% efficiency.
 BioGas gasification process utilizes scrubbers for control at 99.5% efficiency
 Natural Gas gasification process utilizes scrubbers and baghouse for control at 99.5% efficiency
 Storage Piles will be enclosed in a building and will utilize baghouse dust collection for control at 99.5% efficiency; therefore are not considered fugitive and are already included in Waste Receiving calculation.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC***	CO	Total HAPs	Worst ** Single HAP
Landfill	--	--	--	0.00	0.00	0.00	0.00	.0170	.0664 (Ethane)
One (1) pyrolyzer, identified as Pyro001, enclosed, controlled by Baghouse BAG001.						<25.0			
One (1) pyrolyzer, identified as Pyro002, enclosed controlled by Baghouse BAG001	78.02	90.62	90.62	95.0	95.0	<25.0	95.0	24.9	9.98
Waste Receiving Area, RAO01, Waste Processing Area, PA001, all controlled by baghouse BAG002; Dryer/burner MAXB001, (combustion); Char Processing System, controlled by Baghouse BAG001						45.00			
Fugitive Emissions****	16.98	4.38	4.38						
Total PTE of Entire Source	95.0	95.0	95.0	95.0	95.0	95.0	95.0	24.9	9.98
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	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".

** HCl emissions to be limited to less than 10 tons/yr by using lime injection into the airstream to each baghouse, and by limiting the type of feedstock pyrolyzed.

*** VOC emissions to be limited to <25 tons per year for each pyrolyzer in order to render the requirements of 326 IAC §1-6 not applicable.

**** Fugitive Emissions are the total of unpaved roads fugitive dust and the Huntington City Landfill fugitive dust. Detailed calculations are shown in App A of this ATSD.

Appendix A: Emissions Calculations

Company Name: Nature's Fuel
Source Address: 515 South 300 West, Huntington, Indiana 46750
Permit Number: F 069-27596-00081
Reviewer: Jack Harmon
Date: July 1, 2009

PYROLIZER PROCESS

The following calculations determine the potential emissions from the Two (2) Pyrolizer Units

Maximum Throughput Rate = 22.830 tons/hr
Maximum throughput = 200,000.00 tons/yr

Criteria Pollutants	Uncontrolled ⁽¹⁾ Emission Factors (lb/ton)	Unlimited/Uncontrolled Potential to Emit (tons/yr)
PM	3.430	343,000
PM10	3.430	343,000
PM2.5	3.430	343,000
SO ₂	3.230	323,000
NO _x	3.160	316,000
CO	0.299	29,900
VOC ⁽²⁾	0.000	0.000

Methodology

Potential to Emit (tons/yr) = (Maximum Hourly throughput (tons/hr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)*(8760hr/yr)

⁽¹⁾ All Emission Factors are from AP-42, Table 2.1-9, dated October, 1996, for Modular Starved-Air Combustors
Maximum throughput of 200,000 tons per year was provided by source. Hourly rate was calculated by dividing 200,000 tons/yr divided by 8760 hours
Although there are two (2) Pyrolizer units, maximum total throughput is 200,000 tons per year; therefore emissions represent both units.

⁽²⁾ AP-42 Emission Factor was 0.0 lb/ton for VOC. Sister plant to this source had a preliminary stack test result of 1.49 lb/ton VOC, but the two plants are not identical or very similar. Therefore, due to this uncertainty on projected emissions, the source has elected to install continuous emissions monitoring systems equipment in order to ensure compliance with VOC limits.

**Appendix A: Emissions Calculations
Pyrolizer Process
Hazardous Air Pollutants**

Company Name: Nature's Fuel
Source Address: 515 South 300 West, Huntington, Indiana 46750
Permit Number: F 069-27596-00081
Reviewer: Jack Harmon
Date: July 1, 2009

The following calculations determine the unlimited/uncontrolled HAP emissions from the pyrolysis:

Maximum throughput = $\frac{22.830}{200,000.0}$ tons/hr
 tons/yr

Hazardous Air Pollutant	Unlimited/Uncontrolled Emission Factors (lb/ton)	Unlimited/Uncontrolled Potential to Emit (tons/yr)
Arsenic	6.69E-04	6.69E-02
Cadmium	2.41E-03	2.41E-01
Chromium	3.31E-03	3.31E-01
Dioxin	3.31E-08	3.31E-06
Hydrogen Chloride	2.15E+00	2.15E+02
Lead	2.82E-03	2.82E-01
Nickel	5.52E-03	5.52E-01
Mercury	5.60E-03	5.60E-01
Total HAPs		2.17023E+02
Worst Single HAP		2.14990E+02

HCl

Maximum throughput of 200,000 tons per year was provided by source. Hourly rate was calculated by dividing 200,000 tons/yr divided by Unlimited/Uncontrolled Potential to Emit (tons/yr) = (Maximum Annual throughput (tons/yr)) * (Emission Factor (lb/ton)) * 8760 (hr/yr)/(ton/yr)
 Emission Factors are from AP-42, Table 2.1-9, dated October, 1996, Modular Starved-air Combustors

*dioxin = Chlorodibenzo-p-dioxin, chlorodibenzofurans tota

HCL = Hydrogen Chloride

Company Name: Nature's Fuel
 Address City IN Zip: 515 South 300 West, Huntington, Indiana 46750
 Permit No.: F 069-27596-00081
 Reviewer: Jack Harmon
 Date: October 19, 2009

Potential to Emit before Baghouse for Waste Receiving and Waste Processing Areas

(Baghouse BAG002) 0.002 gr/dscf : 70,000 dscf/min x 60 min/hr x pound/7000 gr (1-control eff.) = 0.002 gr/dscf : 70,000 dscf/min x 60 min/hr x 8760 hr/year x pound/7000 gr x ton/2000 pounds =	PM/PM10/PM2.5 Uncontrolled emissions	
	1200.00	lbs/hr
	5256.00	tons/year

Controlled Emissions	
5.256	tons/year
1.2	lb/hr

Methodology

Grain loading after control of 0.002 grains/dscf of PM/PM10

Uncontrolled emissions in pounds per hour = grains/dscf x exhaust air flow rate in dscf/minute x 60 minutes/hour x 7000 grains/pound x (1-co

Uncontrolled emissions in tons per year = emissions in pounds per hour x 8760 hours/year x ton/2000 pounds

Controlled emissions in lb/hr=grains/dscf x flow rate dscf/min x 60 min/hr x 1lb/7000gr

Controlled emissions in tons per year= lb/hr emissions x 8760 x 1/2000

PM10 and PM2.5 emissions equivalent to PM emissions

Baghouse information provided by source, as follows:

Grain loading - 0.002 gr/dscf

Air flow rate - 70,000 dscfm

Baghouse efficiency - 99.9%

Company Name: Nature's Fuel
 Address City IN Zip: 515 South 300 West, Huntington, Indiana 46750
 Permit No.: F 069-26596-00081
 Reviewer: Jack Harmon
 Date: July 1, 2009

Char Processing System
Potential to Emit before Baghouse BAG001

Emission Unit Baghouse	PM/PM10/PM2.5 Uncontrolled emissions	
	0.002 gr/dscf x 70,000 dscf/min x 60 min/hr x pound/7000 gr x (1-control eff.) =	1200.00
0.002 gr/dscf x 70,000 dscf/min x 60 min/hr x 8760 hr/year x pound/7000 gr x ton/2000 pounds =	5256.00	tons/year

Controlled Emissions	
5.256	tons/year
0.04	lb/hr

Methodology

Outlet grain loading after control of 0.005 grains/dscf of PM/PM10/PM2.5

Uncontrolled emissions in pounds per hour = grains/dscf x exhaust air flow rate in dscf/minute x 60 minutes/hour x 7000 grains/pound x (1-cor

Uncontrolled emissions in tons per year = emissions in pounds per hour x 8760 hours/year x ton/2000 pounds

Controlled emissions in lb/hr=grains/dscf x flow rate dscf/min x 60 min/hr x 1lb/7000gr

Controlled emissions in tons per year= lb/hr emissions x 8760 x 1/2000

PM10, PM2.5 emissions equivalent to PM emissions

Baghouse information provided by source, as follows:

Grain loading - 0.002 gr/dscf

Air flow rate - 70,000 dscfm

Baghouse efficiency - 99.9%

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Pyrolizer Area

Company Name: Nature's Fuel
 Address City IN Zip: 515 South 300 West, Huntington, Indiana 46750
 Permit Number: F 069-27596-00081
 Reviewer: Jack Harmon
 Date: July 1, 2009

Maxon Burner MAXB002

Heat Input Capacity MMBtu/hr	Maximum Throughput			
	MMCF/yr	Tons/yr	lb/yr	lb/hr
10.0	87.6	200,000	400000000	45662.1

	Pollutant					
	PM*	PM10, PM2.5*	SO2	NOx	VOC	CO
NATURAL GAS Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.3	0.03	4.4	0.2	3.7
BIO GAS Emission Factor in lb/hr***	0.02	0.02	0.02	0.84	0.02	0.17
Potential Emission in tons/yr	0.09	0.09	0.09	3.68	0.09	0.74

*PM emission factor is filterable PM only. PM10, PM2.5 emission factor is filterable and condensable PM10, PM2.5 combined
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
 ***Emission factor for Bio Gas provided by source and was based on pound per hour x 8760 / 2000

Maxon Burner MAXB003

Heat Input Capacity MMBtu/hr	Maximum Throughput
	MMCF/yr
10.0	87.6

	Pollutant					
	PM	PM10, PM2.5*	SO2	NOx	VOC	CO
NATURAL GAS Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.3	0.03	4.4	0.2	3.7
BIO GAS Emission Factor in lb/hr***	0.02	0.02	0.02	0.84	0.02	0.17
Potential Emission in tons/yr	0.09	0.09	0.09	3.68	0.09	0.74

*PM emission factor is filterable PM only. PM10, PM2.5 emission factor is filterable and condensable PM10, PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
 ***Emission factor for Bio Gas provided by source and was based on pound per hour x 8760 / 2000
 Emissions used are worst case scenario between the two fuels used.

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton for natural gas usage

Potential emission shall be the worst case scenario.

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Pyrolyzer Area
HAPs Emissions

Company Name: Nature's Fuel
Address City IN Zip: 515 South 300 West, Huntington, Indiana 46751
Permit Number: F 069-27596-00081
Reviewer: Jack Harmon
Date: July 1, 2009

Maxon Burner MAXB002

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.198E-05	5.256E-05	3.285E-03	7.884E-02	1.489E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.190E-05	4.818E-05	6.132E-05	1.664E-05	9.198E-05

Maxon Burner MAXB003

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.198E-05	5.256E-05	3.285E-03	7.884E-02	1.489E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.190E-05	4.818E-05	6.132E-05	1.664E-05	9.198E-05

The five highest organic and metal HAPs emission factors are provided above.
HAPs emission factors are from AP-42, Chapter 1.4 for Natural Gas.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Waste Processing Area

Company Name: Nature's Fuel
Address City IN Zip: 515 South 300 West, Huntington, Indiana 46750
Permit Number: F 069-27596-00081
Reviewer: Jack Harmon
Date: July 1, 2009

Maxon Burner MAXB001

Heat Input Capacity MMBtu/hr	Maximum Throughput			
	MMCF/yr	Tons/yr	lb/yr	lb/hr
5.0	43.8	200,000	400000000	45662.1

	Pollutant					
	PM*	PM10, PM2.5*	SO2	NOx	VOC	CO
NATURAL GAS Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.2	0.01	2.2	0.1	1.8
BIO GAS Emission Factor in lb/hr***	0.02	0.02	0.02	0.84	0.02	0.17
Potential Emission in tons/yr	0.09	0.09	0.09	3.68	0.09	0.74

*PM emission factor is filterable PM only. PM10, PM2.5 emission factor is filterable and condensable PM10, PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

***Emission factor for Bio Gas provided by source and was based on pound per hour x 8760 / 2000.

Emissions used are worst case scenario between the two fuels used.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Potential emission shall be the worst case scenario.

Maxon Burner MAXB001

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05

The five highest organic and metal HAPs emission factors are provided above.

HAPs emission factors are from AP-42, Chapter 1.4 for Natural Gas.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads for Nature's Fuel Plant

Company Name: Nature's Fuel
Address City IN Zip: 515 South 300 West, Huntington, Indiana 46750
Permit Number: F 069-27596-00081
Reviewer: Jack Harmon
Date: July 1, 2009

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	30.02	1.0	30.0	35.00	1050.7	1100	0.208	6.3	2282.8
Vehicle (leaving plant) (one-way trip)	30.02	1.0	30.0	13.00	390.3	1100	0.208	6.3	2282.8
Total			60.0		1441.0			12.5	4565.5

Average Vehicle Weight Per Trip = $\frac{24.0}{0.21}$ tons/trip
Average Miles Per Trip = $\frac{24.0}{0.21}$ miles/trip

Unmitigated Emission Factor, $E_f = k \cdot (s/12)^a \cdot (W/3)^b$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	
where k =	4.9	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	= constant (AP-42 Table 13.2.2-2)
W =	24.0	24.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$

Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	
Unmitigated Emission Factor, E_f =	6.58	1.68	lb/mile
Mitigated Emission Factor, E_{ext} =	4.32	1.10	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)
Vehicle (entering plant) (one-way trip)	7.51	1.91	4.94	1.26	2.47	0.63
Vehicle (leaving plant) (one-way trip)	7.51	1.91	4.94	1.26	2.47	0.63
Total	15.01	3.83	9.87	2.52	4.94	1.26

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)
Vehicles listed above include delivery of lime raw material= 80 #/hr usage=350 tpy=10 trucks per year=0.02 trucks per day. 0.02 has been added to vehicles per day number.
All information provided by source 08/19/2009.

Storage Pile

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

$E_f = 1.7 \cdot (s/1.5) \cdot (365-p)/235 \cdot (f/15)$
where E_f = emission factor (lb/acre/day)
s = silt content (wt %)
p = 0 days of rain greater than or equal to 0.01 inches
f = 0 % of wind greater than or equal to 12 mph

Material	Silt Content (wt %)*	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)**	PTE of PM (tons/yr)	PTE of PM10/PM2.5 (tons/yr)
Municipal Solid V	2.6	7.32	0.75	1.002	0.351
		0.00	0.00	0.000	0.000
		0.00	0.00	0.000	0.000
		0.00	0.00	0.000	0.000
		0.00	0.00	0.000	0.000
Totals				1.00	0.35

Methodology

PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)
PTE of PM10/PM2.5 (tons/yr) = (Potential PM Emissions (tons/yr)) * 35%
*Silt content values obtained from source 08/19/2009.
**Maximum anticipated pile size (acres) provided by the source 8/19/2009.
Lime raw material will be stored in an enclosed silo and pneumatically conveyed. No storage piles are included; therefore, there are no additional emis

Appendix A: Emission Calculations

Fugitive Dust Emissions - Unpaved Roads for Nature's Fuel Plant

Company Name: Nature's Fuel
Address City IN Zip: 515 South 300 West, Huntington, Indiana 46750
Permit Number: F 069-27596-00081
Reviewer: Jack Harmon
Date: July 1, 2009

Fugitive Emissions from Lime storage and pneumatic transport.

Pollutant	Lime Usage (lb/hr)	Lime Usage (tons/yr)	Emission Factor (lb/ton)	Potential Emissions (tons/yr)
PM	80.0	350.4	0.72	0.13
PM10	80.0	350.4	0.46	0.08
Total				0.21

Methodology:

- Lime to be injected into Baghouse 001 and Baghouse 002 at a maximum rate of 40 pounds per hour each, for a total of 80 pounds per hour.
- Lime usage per year equals (pounds per hour) x (8,760 hours per year) / (2000 pounds per ton)
- Emission Factors from AP-42, Chapter 11, Table 11.12.2, Rev. June, 2006. for dry cement mix conveyed pneumatically.
- Potential Emissions per year equals (usage tons per year) x (emission factor in pounds per ton) / (2000 pounds per ton).

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads for Landfill

Company Name: Nature's Fuel
Address City IN Zip: 515 South 300 West, Huntington, Indiana 46750
Permit Number: F 069-27596-00081
Reviewer: Jack Harmon
Date: November 17, 2009

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	2.0	2.0	2.0	4.0	6180	1.170	2.3	854.4
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	2.0	4.0	6180	1.170	2.3	854.4
Total			4.0		8.0			4.7	1708.9

Average Vehicle Weight Per Trip = 2.0 tons/trip
 Average Miles Per Trip = 1.17 miles/trip

Unmitigated Emission Factor, $E_f = k[(s/12)^a][(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	
where k =	4.9	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	= constant (AP-42 Table 13.2.2-2)
W =	2.0	2.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$

Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$

where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	
Unmitigated Emission Factor, $E_f =$	2.15	0.55	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.41	0.36	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.92	0.23	0.60	0.15	0.30	0.08
Vehicle (leaving plant) (one-way trip)	0.92	0.23	0.60	0.15	0.30	0.08
	1.84	0.47	1.21	0.31	0.60	0.15

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Storage Pile

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

$E_f = 1.7 * (s/1.5) * (365 - p) / 235 * (f/15)$
where E_f = emission factor (lb/acre/day)
s = silt content (wt %)
p = 0 days of rain greater than or equal to 0.01 inches
f = 0 % of wind greater than or equal to 12 mph

Material	Silt Content (wt %)*	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)**	PTE of PM (tons/yr)	PTE of PM10/PM2.5 (tons/yr)
Municipal Solid Waste	2.6	0.61	0.75	0.084	0.029
		0.00	0.00	0.000	0.000
		0.00	0.00	0.000	0.000
		0.00	0.00	0.000	0.000
		0.00	0.00	0.000	0.000
Totals				0.08	0.03

Methodology

PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)
 PTE of PM10/PM2.5 (tons/yr) = (Potential PM Emissions (tons/yr)) * 35%
 *Silt content values obtained from AP-42 Table 13.2.4-1 (dated 1/95)
 **Maximum anticipated pile size (acres) provided by the source.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Glenn Johnson
Nature's Fuel
421 E. Cook Road, Ste 400
Fort Wayne, IN 46825

DATE: May 17, 2010

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
New Source Construction and Federally Enforceable State Operating Permit
069-27596-00081

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Chris Heaton - Industrial Safety & Environmental Services, Inc.
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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May 17, 2010

TO: Huntington City Township Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Nature's Fuel
Permit Number: 069-27596-00081

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 5/17/2010 Natures Fuel 069-27596-00081 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Glenn Johnson Natures Fuel 421 E Cook Rd Ste 400 Fort Wayne IN 46825 (Source CAATS) via confirmed delivery										
2		Mr. Charles L. Berger Attorney Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
3		Huntington Town Council and Mayors Office 300 Cherry St. Huntington IN 46750 (Local Official)										
4		Huntington County Board of Commissioners 354 N. Jefferson St. Suite 201 Huntington IN 46750 (Local Official)										
5		Huntington City Twp Public Library 200 W Market Huntington IN 46750-2655 (Library)										
6		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
7		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
8		Huntington County Health Department 354 N. Jefferson Street, Suite 201 Huntington IN 46750 (Health Department)										
9		Melvin & Deborah Gillespie 5616 N 200 E Huntington IN 46750 (Affected Party)										
10		Mr. Chris Heaton Industrial Safety and Environmental Services, Inc. 30723 Old US 20 Elkhart IN 46514 (Consultant)										
11		Richard and Sharon Goodrich 2719 W. Division Rd Huntington IN 46750 (Affected Party)										
12		Michael Bracht 2699 W. Division Rd Huntington IN 46750 (Affected Party)										
13		Angela Kaylor 2681 W. Division Rd Huntington IN 46750 (Affected Party)										
14		Randall and Cynthia Bellamy 2651 W. Division Rd Huntington IN 46750 (Affected Party)										
15		Gary and Mary Thompson 2413 W. Division Rd Huntington IN 46750 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
14			

Mail Code 61-53

IDEM Staff	GHOTOPP 5/17/2010 Natures Fuel 069-27596-00081 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Bart & Tamara Wright 396S-200W Huntington IN 46750 (Affected Party)										
2		Carl Swine Enterprises 655S-200W Huntington IN 46750 (Affected Party)										
3		Mr. Colin OBrien Natural Resources Defense Council 1200 New York Avenue NW, Ste. 400 Washington DC 20005 (Affected Party)										
4												
5												
6												
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10												
11												
12												
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14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
3			