



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 6, 2013

RE: ICS Cargo Clean, LLC / 019-31147-00077

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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## Minor Source Operating Permit OFFICE OF AIR QUALITY

**ICS Cargo Clean, LLC  
6213 Gheens Mill Road  
Jeffersonville, Indiana 47130**

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M019-31147-00077	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 6, 2013  Expiration Date: March 6, 2018

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary container reconditioning facility.

Source Address:	6213 Gheens Mill Road, Jeffersonville, Indiana 47130
General Source Phone Number:	(502) 637-5428
SIC Code:	7699 (Repair Shops and Related Services, Not Elsewhere Classified)
County Location:	Clark
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Drum Cleaning Line, constructed in 1996, with a maximum rate of 200 drums per hour, using a wet scrubber for odor control only, exhausting outdoors, and consisting of the following:
  - (1) One (1) external wash, identified as #2, utilizing both spray nozzles and brushes, and utilizing non-VOC containing materials (caustic wash solution, water, and acetone) to clean the exterior of drums.
  - (2) One (1) internal wash machine, identified as #14, utilizing spray nozzles, utilizing non-VOC containing materials (caustic wash solution, water, and acetone) to clean the interior of drums.
  - (3) One (1) caustic tank, identified as #17, process holding tank to allow recirculation of caustic wash solution.
  - (4) Hand application of VOC containing materials, non-VOC containing materials, and wax.
- (b) One (1) IBC Cleaning Line, constructed in 1996, which consists of the following:
  - (1) One (1) external/internal wash area, identified as #35, with a maximum capacity of 30 IBCs per hour, utilizing spray nozzles and brushes, utilizing non-VOC containing materials (caustic wash solution, water, and acetone) to clean drums, using no controls, and exhausting indoors.
  - (2) Hand application of VOC containing materials.

- (c) Natural Gas fired units consisting of the following:
  - (1) Four (4) immersion tube burners, identified as Burner#3, Burner#15, Burner#17, and Burner#18, each constructed in 1996, with maximum heat input capacities 2.75 million British thermal units (MMBtu) per hour, 1.75 million British thermal units (MMBtu) per hour, 1.75 million British thermal units (MMBtu) per hour, and 0.5 million British thermal units (MMBtu) per hour, respectively, using no controls and exhausting indoors.
  - (2) One (1) line burner, identified as Burner#10, constructed in 1996, with a maximum heat input capacity of 0.75 million British thermal units (MMBtu) per hour, using no controls and exhausting indoors.
  - (3) One (1) air heat burner, identified as Burner#26, constructed in 1996, with a maximum heat input capacity of 3.0 million British thermal units (MMBtu) per hour, using no controls and exhausting indoors.
- (d) One (1) manual Miscellaneous Material Usage Operation, identified as #34, constructed in 2011, used for touch up paint of reconditioned poly drums and IBCs, with a maximum capacity of 200 drums per hour and 30 IBCs per hour, using no controls, and exhausting indoors.
- (e) One (1) 100 horse power barrel grinder, identified as #36, constructed in 2011, used for shredding plastic barrels that are beyond reconditioning into 3/8 inch pieces, with a maximum capacity of 2500 pounds per hour, using no controls, and exhausting indoors.

## SECTION B GENERAL CONDITIONS

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

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

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- (a) This permit, M019-31147-00077, 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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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.4 Enforceability

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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.5 Severability

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

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- (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.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
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) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, 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 Permittee shall implement the PMPs.

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

**B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M019-31147-00077 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.12 Permit Renewal [326 IAC 2-6.1-7]**

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- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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

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

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.14 Source Modification Requirement**

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

**B.15 Inspection and Entry**

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

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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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.17 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.18 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

#### C.2 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

#### C.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

#### C.6 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.

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

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

#### **C.7 Performance Testing [326 IAC 3-6]**

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- (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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

### **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

#### **C.9 Compliance Monitoring [326 IAC 2-1.1-11]**

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

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

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

## Corrective Actions and Response Steps

### C.11 Response to Excursions or Exceedances

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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.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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- (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.

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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- (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.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) Reports required by conditions in Section D of 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

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

- (c) 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.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	ICS Cargo Clean, LLC
<b>Address:</b>	6213 Gheens Mill Road
<b>City:</b>	Jeffersonville, Indiana 47130
<b>Phone #:</b>	(502) 637-5428
<b>MSOP #:</b>	M019-31147-00077

I hereby certify that ICS Cargo Clean, LLC is :

still in operation.

no longer in operation.

I hereby certify that ICS Cargo Clean, LLC is :

in compliance with the requirements of MSOP M019-31147-00077.

not in compliance with the requirements of MSOP M019-31147-00077.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**  
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**FAX NUMBER: (317) 233-6865**

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM  
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

Technical Support Document (TSD) for a Minor Source Operating Permit  
(MSOP)

**Source Description and Location**

**Source Name:** ICS Cargo Clean, LLC  
**Source Location:** 6213 Gheens Mill Road, Jeffersonville, IN 47130  
**County:** Clark  
**SIC Code:** 7699 (Repair Shops and Related Services, Not Elsewhere Classified)  
**MSOP No.:** M019-31147-00077  
**Permit Reviewer:** Deena Patton

On November 14, 2011, the Office of Air Quality (OAQ) received an application from ICS Cargo Clean, LLC related to the operation of an existing stationary container reconditioning facility.

**Existing Approvals**

The source has been operating under Construction Permit (CP) No. 019-4837-00077, issued on August 30, 1996.

**County Attainment Status**

The source is located in Clark County.

<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark county and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X\*. The 1-hour standard was revoked effective June 15, 2005.  
Basic nonattainment designation effective federally April 5, 2005, for PM<sub>2.5</sub>.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Clark County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were

reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

- (c) Other Criteria Pollutants  
Clark 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**

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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, 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 Emission Units and Pollution Control Equipment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by ICS Cargo Clean, LLC on November 14, 2011, relating to the operation of a container reconditioning facility.

The source consists of the following existing emission units:

- (a) One (1) Drum Cleaning Line, constructed in 1996, with a maximum rate of 200 drums per hour, using a wet scrubber for odor control only, exhausting outdoors, and consisting of the following:
- (1) One (1) external wash, identified as #2, utilizing both spray nozzles and brushes, and utilizing non-VOC containing materials (caustic wash solution, water, and acetone) to clean the exterior of drums.
  - (2) One (1) internal wash machine, identified as #14, utilizing spray nozzles, utilizing non-VOC containing materials (caustic wash solution, water, and acetone) to clean the interior of drums.
  - (3) One (1) caustic tank, identified as #17, process holding tank to allow recirculation of caustic wash solution.
  - (4) Hand application of VOC containing materials, non-VOC containing materials, and wax.
- (b) One (1) IBC Cleaning Line, constructed in 1996, which consists of the following:
- (1) One (1) external/internal wash area, identified as #35, with a maximum capacity of 30 IBCs per hour, utilizing spray nozzles and brushes, utilizing non-VOC containing materials (caustic wash solution, water, and acetone) to clean drums, using no controls, and exhausting indoors.
  - (2) Hand application of VOC containing materials.
- (c) Natural Gas fired units consisting of the following:
- (1) Four (4) immersion tube burners, identified as Burner#3, Burner#15, Burner#17, and Burner#18, each constructed in 1996, with maximum heat input capacities 2.75 million British thermal units (MMBtu) per hour, 1.75 million British thermal units (MMBtu) per

hour, 1.75 million British thermal units (MMBtu) per hour, and 0.5 million British thermal units (MMBtu) per hour, respectively, using no controls and exhausting indoors.

- (2) One (1) line burner, identified as Burner#10, constructed in 1996, with a maximum heat input capacity of 0.75 million British thermal units (MMBtu) per hour, using no controls and exhausting indoors.
- (3) One (1) air heat burner, identified as Burner#26, constructed in 1996, with a maximum heat input capacity of 3.0 million British thermal units (MMBtu) per hour, using no controls and exhausting indoors.
- (d) One (1) manual Miscellaneous Material Usage Operation, identified as #34, constructed in 2011, used for touch up paint of reconditioned poly drums and IBCs, with a maximum capacity of 200 drums per hour and 30 IBCs per hour, using no controls, and exhausting indoors.
- (e) One (1) 100 horse power barrel grinder, identified as #36, constructed in 2011, used for shredding plastic barrels that are beyond reconditioning into 3/8 inch pieces, with a maximum capacity of 2500 pounds per hour, using no controls, and exhausting indoors.

**Enforcement Issues**

ICS Cargo Clean, LLC was issued a Construction Permit (CP) No. 019-4837-00077 on August 30, 1996, for a container reconditioning facility. Pursuant to 326 IAC 2-6.1-3, the source was required to apply for MSOP by November 15, 2001 (90 days prior to the expiration date of February 15, 2002). On November 14, 2011, IDEM, OAQ received an application from ICS Cargo Clean, LLC. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the operating permit rules.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP**

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	0.21
PM10 <sup>(1)</sup>	0.42
PM2.5	0.42
SO <sub>2</sub>	0.03
NO <sub>x</sub>	4.51
VOC	39.85
CO	3.79
GHGs as CO <sub>2</sub> e	5444
Worst Single HAP	0.45 (Ethoxydiglycol)
Total HAPs	0.76

(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".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

<b>Federal Rule Applicability Determination</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not coat metal furniture.
- (b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not coat automobiles or light duty trucks.
- (c) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (326 IAC 12), are not included in the permit, since this source does not coat pressure sensitive tape or labels.
- (d) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since this source does not coat large appliances.
- (e) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (326 IAC 12), are not included in the permit, since this source does not coat metal coils.
- (f) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW (326 IAC 12), are not included in the permit, since this source does not coat beverage cans.
- (g) The requirements of the New Source Performance Standard for Magnetic Tape Coating Facilities, 40 CFR 60, Subpart SSS (326 IAC 12), are not included in the permit, since this source does not coat magnetic tapes.
- (h) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT (326 IAC 12), are not included in the permit, since this source does not coat plastic parts for business machines.
- (i) There are no 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)

- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6), are not included in the permit, since this source does not use solvents that contain methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination of these as described in §63.460(a).
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD, (326 IAC 20-95), are not included in the permit, is not a major source of HAPs.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85), are not included in the permit, since this source does not coat automobiles or light duty trucks and is not a major source of HAPs.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Cans, 40 CFR 63.3080, Subpart KKKK (326 IAC 20-86), are not included in the permit, since this source does not coat metal cans and is not a major source of HAPs.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source does not coat metal parts or products and is not a major source of HAPs.
- (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Large Appliances, 40 CFR 63.4080, Subpart NNNN (326 IAC 20-63), are not included in the permit, since this source does not coat large appliances and is not a major source of HAPs.
- (p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP (326 IAC 20-81), are not included in the permit, since this source is not a major source of HAPs.
- (q) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63.4680, Subpart QQQQ (326 IAC 20-79), are not included in the permit, since this source does not coat wood building products and is not a major source of HAPs.
- (r) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are not included in the permit, since this source does not coat metal furniture and is not a major source of HAPs.
- (s) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Coil, 40 CFR 63.5080, Subpart SSSS (326 IAC 20-64), are not included in the permit, since this source does not coat metal coil and is not a major source of HAPs.
- (t) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH (6H), are not included in the permit, since this source does not have a paint stripping or automotive refinishing operation, use coatings containing compounds of chromium, lead, manganese, nickel, or cadmium.

- (u) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJJ (6J) (326 IAC 20-), since the four (4) immersion tube burners are fired with natural gas, which is exempt under §63.11195(e).
- (v) There are no 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)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO<sub>2</sub>e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-3 (Emission Offset) and (for PM<sub>2.5</sub> nonattainment counties) 326 IAC 2-1.1-5 (Nonattainment New Source Review)  
This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit all nonattainment regulated pollutants are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.  
  
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM<sub>2.5</sub>), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (f) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.
- (i) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (j) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

Drum Cleaning Line, IBC Cleaning Line, and Miscellaneous Material Usage Operation

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(8), the Drum Cleaning Line (Units #2, #14, and #17) and the IBC Cleaning Line (Unit #35), are each not subject to the requirements of 326 IAC 6-3-2, since each uses hand application to apply materials, and each does not emit particulate matter (i.e., the materials applied do not contain solids).  
  
Pursuant to 326 IAC 6-3-1(b)(15), the Miscellaneous Material Usage Operation (Unit #34), is exempt from 326 IAC 6-3-2, since it uses less than five (5) gallons per day.
- (l) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a), the requirements of 326 IAC 6.5 are not applicable to the Drum Cleaning Line (Units #2, #14, and #17), the IBC Cleaning Line (Unit #35), and the Miscellaneous Material Usage Operation (Unit #34), since the potential to emit of the entire source is less than ten (10) tons of particulate matter per year.
- (m) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)  
Pursuant to 326 IAC 8-1-6(1), the requirements of 326 IAC 8-1-6 are not applicable to the Drum Cleaning Line (Units #2, #14, and #17), the IBC Cleaning Line (Unit #35), and the Miscellaneous Material Usage Operation (Unit #34), since these facilities each have potential emissions of less than 25 tons per year of VOC.
- (n) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)  
Pursuant to 326 IAC 8-2-9(a), the requirements of 326 IAC 8-2-9 are not applicable to the Drum Cleaning Line, the IBC Cleaning Line, and the Miscellaneous Material Usage Operation, since the source operates under SIC Code 7699, which is not listed under one of the SIC Code major groups #33, #34, #35, #36, #37, #38, or #39, and these units are not considered surface coating

of commercial or industrial machinery and equipment. The containers reconditioned at this source would not be considered commercial or industrial machinery and equipment.

In addition, the requirements of 326 IAC 8-2-9 are not applicable to each of the facilities at this source for the following reasons:

- (1) The application of wax in the Drum Cleaning Line has potential VOC emissions of less than fifteen (15) pounds per day before add on controls. The wash solution (caustic wash solution, water and acetone), the aluminum brightener, and the methyl ethyl ketone (MEK) solvent used in the hand cleanup of the exterior of drums are each not considered a "coating" as defined by 326 IAC 8-1-0.5, since they each are not considered a protective, functional, or decorative film.
  - (1) The detergent wash solution and the methyl ethyl ketone (MEK) solvent used in the hand cleanup of the exterior of drums are each not considered a "coating" as defined by 326 IAC 8-1-0.5, since they each are not considered a protective, functional, or decorative film.
  - (3) The application of touch up paint in the Miscellaneous Material Usage Operation has potential VOC emissions of less than fifteen (15) pounds per day before add on controls.
- (o) 326 IAC 8-3 (Organic Solvent Degreasing Operations)  
Pursuant to 326 IAC 8-3-1(b)(2), the Drum Cleaning Line (Units #2, #14, and #17) and the IBC Cleaning Line (Unit #35) are not subject to 326 IAC 8-3, since these units are not classified as cold cleaners, conveyORIZED degreasers, or open top degreasers as defined in 326 IAC 1-2-18.5, 326 IAC 1-2-21.5, and 326 IAC 1-2-49.5, respectively, and use non-VOC containing materials (caustic wash solution, water, and acetone) to clean the drums in units #2, #14, and #35.
- (p) 326 IAC 8-6 (VOC Rules: Organic Solvent Emission Limitations)  
Pursuant to 326 IAC 8-6-1, this rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. Pursuant to 326 IAC 8-6-1, this source is not subject to the requirements 326 IAC 8-6, because this source, which is located in Clark County, did not commence operation after October 7, 1974 and prior to January 1, 1980, and does not have potential VOC emissions of 100 tons per year or more.
- (q) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)  
Pursuant to 326 IAC 8-7-2(a), the requirements of 326 IAC 8-7, are not applicable to this source (located in Clark County), since the potential emissions from the entire source are less than 100 tons per year, and since the potential emissions from each surface coating facility are less than ten (10) tons per year (surface coatings include wax applied in the Drum Cleaning Line and touch up paint applied in the Miscellaneous Material Usage Operation).
- Note: Pursuant to 326 IAC 8-7-2(a), VOC emissions associated with the detergent wash solution and the methyl ethyl ketone (MEK) solvent used in the hand cleanup of the exterior of drums in the Drum Cleaning Line and the IBC Cleaning Line is not included in the determining whether these facilities exceed the applicability thresholds for this rule, since application of these materials are each not considered a "coating facility". These materials are each not considered a "coating" as defined by 326 IAC 8-1-0.5, since each is not considered a protective, functional, or decorative film.
- (r) 326 IAC 8-17 (Industrial Solvent Cleaning Operations)  
Pursuant to 326 IAC 8-17-1(a)(3), the requirements of 326 IAC 8-17 are not applicable to this source, since the source is not located in Lake or Porter County.

- (s) 326 IAC 8-19 (VOC Rules: Control of Volatile Organic Compound Emissions from Process Vents in Batch Operations)  
Pursuant to 326 IAC 8-19-1, this source is not subject to the requirements of 326 IAC 8-18, since it is not located in Lake or Porter County, it does not have the potential to emit VOC greater than or equal to one hundred (100) tons per year, and it does not have a batch process train associated with any of the SIC Codes listed under 326 IAC 8-19-1(a).
- (t) 326 IAC 8-20 (VOC Rules: Industrial Wastewater)  
Pursuant to 326 IAC 8-20-1, this source is not subject to the requirements of 326 IAC 8-20, since it is not located in Lake or Porter County, it does not have the potential to emit VOC greater than or equal to one hundred (100) tons per year from emission sources listed under 326 IAC 8-20-1(a)(2), and it does not facility operations specifically listed under any of the SIC Codes listed under 326 IAC 8-20-1(a)(3).

#### Natural Gas Fired Units

- (u) 326 IAC 6-2-4 (Particulate Emission Limitations for Indirect Heating Units)  
Pursuant to 326 IAC 6-2-1(a), the requirements of 326 IAC 6-2-4 are not applicable to the natural gas fired units, since the natural gas fired units are not sources of indirect heating.
- (v) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable to the natural gas fired units, since the potential emissions from each unit are less than five hundred fifty-one thousandths (0.551) pound per hour and each unit is not considered a manufacturing process.
- (w) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a), the requirements of 326 IAC 6.5 are not applicable to the natural gas fired units, since the source is not specifically listed and the potential to emit particulate matter from the entire source is less than ten (10) tons of per year.
- (x) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
Pursuant to 326 IAC 7-1.1-1, the requirements of 326 IAC 7-1.1 are not applicable to the natural gas fired units, since the potential emissions from each unit are less than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.
- (y) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)  
Pursuant to 326 IAC 8-1-6(1), the requirements of 326 IAC 8-1-6 are not applicable to each of the emission units at this source, since the potential emissions from each unit are less than 25 tons per year.

#### Barrel Shredder

- (z) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(14), the barrel shredder is exempt form 326 IAC 6-3-2, since the potential emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.
- (aa) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a)(2), the requirements of 326 IAC 6.5 are not applicable to the barrel shredder, since the source is not specifically listed and the potential to emit particulate matter from the entire source is less than ten (10) tons per year.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance

provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

- (a) There are no compliance determination and monitoring requirements applicable to this source.

### **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 November 14, 2011.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 019-31147-00077. The staff recommends to the Commissioner that this MSOP be approved.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Deena Patton at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5400 or toll free at 1-800-451-6027 extension 4-5400.
- (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.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emissions Calculations  
PTE Summary**

**Company Name:** ICS Cargo Clean, LLC  
**Source Address:** 6213 Gheens Mill Road, Jeffersonville, IN 47130  
**Permit Number:** M019-31147-00077  
**Reviewer:** Deena Patton

Uncontrolled Potential to Emit (tons/ year)											
Emission Unit/ ID	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP	
Drum Cleaning Line	0.00	0.00	0.00	0.0	0.0	19.28	0.0	0.0	0.45	0.45	Ethoxydiglycol
IBC Cleaning Line	0.00	0.00	0.00	0.0	0.0	19.87	0.0	0.0	0.00	0.00	--
Miscellaneous Material Usage	0.02	0.02	0.02	0.0	0.0	0.45	0.0	0.0	0.23	0.15	Ethylbenzene
Natural Gas Fired Units	0.09	0.34	0.34	0.03	4.51	0.25	3.79	5444	0.09	0.08	Hexane
Barrel Shredder	0.11	0.06	0.06	0.0	0.0	0.0	0.0	0.0	0.0	0.0	--
<b>Total</b>	<b>0.21</b>	<b>0.42</b>	<b>0.42</b>	<b>0.03</b>	<b>4.51</b>	<b>39.85</b>	<b>3.79</b>	<b>5444</b>	<b>0.76</b>	<b>0.45</b>	<b>Ethoxydiglycol</b>

Appendix A: Emissions Calculations

VOC and Particulate  
From Drum Cleaning Line, IBC Cleaning Line, and Miscellaneous Material Usage

Company Name: ICS Cargo Clean, LLC  
Source Address: 6213 Gheens Mill Road, Jeffersonville, IN 47130  
Permit Number: M019-31147-00077  
Reviewer: Deena Patton

Process	Material	Application Type	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Potential Usage (gal/hr)*	Maximum Potential Usage (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency %
Drum Cleaning Line	Proforce High Gloss Floor Finish (Cleaning Wax)	hand application to polish drum exterior	8.6	100.00%	99.95%	0.05%	99.95%	0.00%	0.30	7.20	8.59	0.00	0.00	0.03	0.01	0.00	100%
Drum Cleaning Line	Aluminum Conditioner (Aluminum Brightner)	hand application	9.2	95.10%	95.10%	0.0%	95.1%	0.00%	0.17	3.96	0.0	0.00	0.00	0.00	0.00	0.00	100%
Drum Cleaning Line**	Methyl Ethyl Ketone (MEK) Solvent**	hand application to cleanup drum exterior	8.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.55	13.20	8.00	8.00	4.40	105.60	19.27	0.00	100%
Drum Cleaning Line: Caustic Tank	Acetone (non-VOC)	hand application	7.0	100.00%	100.0%	0.0%	100.0%	0.00%	0.55	13.20	0.0	0.00	0.00	0.00	0.00	0.00	100%
<b>Total for Drum Cleaning Line:</b>												<b>4.40</b>	<b>105.63</b>	<b>19.28</b>	<b>0.00</b>		
IBC Cleaning Line	LC-1252 (Detergent)	hand application	8.3	100.00%	95.0%	5.0%	95.0%	0.00%	0.33	7.92	8.34	0.42	0.14	3.30	0.60	0.00	100%
IBC Cleaning Line**	Methyl Ethyl Ketone (MEK) Solvent**	hand application to cleanup drum exterior	8.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.55	13.20	8.00	8.00	4.40	105.60	19.27	0.00	100%
<b>Total for IBC Cleaning Line:</b>												<b>4.54</b>	<b>108.90</b>	<b>19.87</b>	<b>0.00</b>		
Misc. Material Usage	PREM Metallic Silver (Touch-up Paint)	aerosol spray	6.4	95.00%	35.0%	60.0%	35.0%	5.00%	0.03	0.65	5.89	3.83	0.10	2.48	0.45	0.02	50%
<b>Total for Misc. Material Usage:</b>												<b>0.10</b>	<b>2.48</b>	<b>0.45</b>	<b>0.02</b>		
<b>Combined Total:</b>												<b>9.04</b>	<b>217.01</b>	<b>39.61</b>	<b>0.02</b>		

METHODOLOGY

\*Maximum Potential Usage (gal/hr) is calculated by dividing the actual annual usage by the actual annual hours of operation (2000 hours/year)  
 \*\*The Maximum Potential Usage (gal/day) for the MEK solvent used in the Drum and IBC Cleaning lines is a combined total and scaled up for the two lines.  
 Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total = Worst Coating + Sum of all solvents used

Hazardous Air Pollutants (HAPs)

Process	Material	Application Type	Density (Lb/Gal)	Maximum Usage (gal/hr)	Weight % Ethoxydiglycol	Weight % Xylene	Weight % Ethylbenzene	Ethoxydiglycol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total HAPs (ton/yr)
Drum Cleaning Line	Proforce High Gloss Floor Finish (Cleaning Wax)	hand application	8.6	0.30	4.00%	0.0%	0.0%	0.45	0.0	0.0	0.45
Drum Cleaning Line	Aluminum Conditioner (Aluminum Brightner)	hand application	9.2	0.17	0.0%	0.0%	0.0%	0.0	0.0	0.0	0.0
Drum Cleaning Line**	Methyl Ethyl Ketone (MEK) Solvent**	hand application	8.0	0.55	0.0%	0.0%	0.0%	0.0	0.0	0.0	0.0
Drum Cleaning Line: Caustic Tank	Acetone (non-VOC)	hand application	7.0	0.55	0.0%	0.0%	0.0%	0.0	0.0	0.0	0.0
<b>Total for Drum Cleaning Line:</b>								<b>0.45</b>	<b>0.0</b>	<b>0.0</b>	<b>0.45</b>
IBC Cleaning Line	LC-1252 (Detergent)	hand application	8.3	0.33	0.0%	0.0%	0.0%	0.0	0.0	0.0	0.0
IBC Cleaning Line**	Methyl Ethyl Ketone (MEK) Solvent**	hand application	8.0	0.55	0.0%	0.0%	0.0%	0.0	0.0	0.0	0.0
<b>Total for IBC Cleaning Line:</b>								<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Misc. Material Usage	PREM Metallic Silver (Touch-up Paint)	aerosol spray	6.4	0.03	0.0%	10.00%	20.00%	0.0	0.08	0.15	0.23
<b>Total for Misc. Material Usage:</b>								<b>0.0</b>	<b>0.08</b>	<b>0.15</b>	<b>0.23</b>
<b>Combined Total:</b>								<b>0.45</b>	<b>0.08</b>	<b>0.15</b>	<b>0.68</b>

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) \* Maximum Usage (gal/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** ICS Cargo Clean, LLC  
**Source Address:** 6213 Gheens Mill Road, Jeffersonville, IN 47130  
**Permit Number:** M019-31147-00077  
**Reviewer:** Deena Patton

Emission Units	MMBtu/hr
Burner #3	2.75
Burner #15	1.75
Burner #17	1.75
Burner #18	0.5
Burner #10	0.75
Burner #26	3
<b>Total</b>	<b>10.5</b>

Heat Input Capacity  
MMBtu/hr

10.5

HHV  
mmBtu  
mmscf

1020

Potential Throughput  
MMCF/yr

90.2

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.09	0.34	0.34	0.03	4.51	0.25	3.79

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 HAPs Emissions**

**Company Name:** ICS Cargo Clean, LLC  
**Source Address:** 6213 Gheens Mill Road, Jeffersonville, IN 47130  
**Permit Number:** M019-31447-00077  
**Reviewer:** Deena Patton

HAPs - Organics					
Emission Factor in lb/MMcf	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	9.5E-05	5.4E-05	3.4E-03	8.1E-02	1.5E-04

HAPs - Metals					
Emission Factor in lb/MMcf	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	2.3E-05	5.0E-05	6.3E-05	1.7E-05	9.5E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.  
 See Page 3 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Greenhouse Gas Emissions**

**Company Name:** ICS Cargo Clean, LLC  
**Source Address:** 6213 Gheens Mill Road, Jeffersonville, IN 47130  
**Permit Number:** M019-31447-00077  
**Reviewer:** Deena Patton

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	5,411	0.1	0.1
Summed Potential Emissions in tons/yr	5,411		
CO2e Total in tons/yr	5,444		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 $Emission (tons/yr) = Throughput (MMCF/yr) \times Emission Factor (lb/MMCF) / 2,000 lb/ton$   
 $CO2e (tons/yr) = CO2 Potential Emission ton/yr \times CO2 GWP (1) + CH4 Potential Emission ton/yr \times CH4 GWP (21) + N2O Potential Emission ton/yr \times N2O GWP (310).$

**Appendix A: Emissions Calculations  
Barrel Shredder**

**Company Name:** ICS Cargo Clean, LLC  
**Source Address:** 6213 Gheens Mill Road, Jeffersonville, IN 47130  
**Permit Number:** M019-31147-00077  
**Reviewer:** Deena Patton

Uncontrolled Potential to Emit						
Operation Type	Maximum Capacity (lbs/hour)	Maximum Capacity (ton/hr)	PM Emission Factor (lb/ton)*	PM10/PM2.5 Emission Factor (lb/ton)*	PM (tons/yr)	PM10/PM2.5 (tons/yr)
Barrel Grinder (#36)	2500	1.25	0.02	0.011	0.11	0.06

**Methodology:**

\*There are no AP42 emission factors for grinding of plastic. Therefore PM/PM10/PM2.5 emissions were conservatively estimated using emission factors from AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants EPA March 1990 for Sawmill Operations (Log Sawing: General). PM2.5 emissions assumed equal to PM10 emissions.

Maximum Capacity (ton/hr) = Max. Capacity (lbs/hour) / 2000 lbs

PM (tons/yr) = Max. Capacity (ton/hr) \* PM Emission Factor (lb/ton) \* 8760 hours / 2000 lbs

PM10/PM2.5 (tons/yr) = Max. Capacity (ton/hr) \* PM10 Emission Factor (lb/ton) \* 8760 hours / 2000 lbs



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Dan Wheeler  
ICS Cargo Clean LLC  
405 Industry Road  
Louisville, KY 40208

**DATE:** March 6, 2013

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

**SUBJECT:** Final Decision  
Minor Source Operating Permit  
019-31147-00077

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:  
Kay Rykowski – Industrial Container Services, LLC  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



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[www.idem.IN.gov](http://www.idem.IN.gov)

March 6, 2013

TO: Sellersburg Library

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

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

**Applicant Name: ICS Cargo Clean, LLC**  
**Permit Number: 019-31147-00077**

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 3/6/2013 ICS Cargo Clean LLC 019-31147-00077 Final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		Dan Wheeler ICS Cargo Clean LLC 405 Industry Rd Louisville KY 40208 (Source CAATS) via confirmed delivery										
2		Ruth & Jesse Sneed 18703 Highway 60 Borden IN 47106 (Affected Party)										
3		Ms. Barbara Lothery C/O Brown Residence 15912 Hwy 60 Borden IN 47106 (Affected Party)										
4		Christy & Thomas Brown 15912 Highway 60 Borden IN 47106 (Affected Party)										
5		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
6		Mr. Tony & Brian Wimsatt 6028 Stacy Rd Charlestown IN 47111 (Affected Party)										
7		Ms. Pam Beaufait 110 Forest Dr Charlestown IN 47111 (Affected Party)										
8		Mr. Pat Greene 16 Balmer Dr Charlestown IN 47111 (Affected Party)										
9		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)										
10		R. M. Borha, Sr 172 Silverwood Ln Clarksville IN 47129 (Affected Party)										
11		Mr. Gerald Doss 2 Rosewood Dr Clarksville IN 47129 (Affected Party)										
12		Patsy & Larry Bolton 1033 Hazelwood Dr Clarksville IN 47129 (Affected Party)										
13		Alisa & Charles Geary 632 N. Clark Blvd Clarksville IN 47129 (Affected Party)										
14		Danny & Carol Madden C/O Marjorie Stratton 801 Spicewood Dr Clarksville IN 47130 (Affected Party)										
15		Ms. Wendy Casey C/O Marjorie Stratton 801 Spicewood Dr Clarksville IN 47130 (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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Carol Longwell 811 Spicewood Dr Clarksville IN 47130 (Affected Party)										
2		Mr. Michael Banet 2810 Andrew Dr Floyds Knobs IN 47119 (Affected Party)										
3		Ms. Joanne Thorpe 3217 Coach Ln SE Grand Rapids MI 49512-2775 (Affected Party)										
4		Mrs. Sandy Banet 514 Haddox Rd Henryville IN 47126 (Affected Party)										
5		Matthew & Jaqueline Tengi 5606 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
6		Robert & Tammy Voyles 4318 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
7		Ms. Donna Warren 5813 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
8		Mr. Charles Wilson 5006 Charleston Pike Jeffersonville IN 47130 (Affected Party)										
9		Ms. Karen Thompson C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
10		Cforca Voyles 5606 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
11		Ms. Edith Waddell 5108 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
12		Ms. Sharon Wasovich C/O Flynn Residence 511 Sara Court Jeffersonville IN 47130 (Affected Party)										
13		William & Nancy Sloan 4604 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
14		Russel & Susan Soeder 3301 Forrest Dr Jeffersonville IN 47130 (Affected Party)										
15		Ms. Connie Stahl 5710 1/2 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										

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1		Donald Stahl C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
2		Ms. Nancv Stahl C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
3		Mr. C. Scott Stewart C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
4		Ms. Marie Renn C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
5		Gregory & Karen Read 5620 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
6		Bryan & Tammi Roberts 5622 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
7		Priscilla & Stuart Robertson 2200 Utica Pike Jeffersonville IN 47130 (Affected Party)										
8		Mr. Zachary Rogers 3301 Forest Dr Jeffersonville IN 47130 (Affected Party)										
9		Mr. Jeff Rorrer C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
10		Mr. Darrell Sanford C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
11		Mr. Todd Overpeck 5821 Charleston Pike Jeffersonville IN 47130 (Affected Party)										
12		Ms. Sue Priest C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
13		Mr. Randall Pritchard 2704 Hampton Jeffersonville IN 47130 (Affected Party)										
14		Ms. Patricia Pearson C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
15		Brooks Phillips C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										

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1		Doug McCartin C/O Frantz Residence 410 Merryman Dr Jeffersonville IN 47130 (Affected Party)										
2		Mr. Robert McCarten C/O Frantz Residence 410 Merryman Dr Jeffersonville IN 47130 (Affected Party)										
3		Ms. Perry & Marcia Eddings C/O Frantz Residence 410 Merryman Dr Jeffersonville IN 47130 (Affected Party)										
4		Ms. Barbara Moses C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
5		Mr. Damon Moses C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
6		Ms. Melissa Meek C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
7		Ms. Margaret Morton C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
8		Ms. Lisa Long C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
9		Mr. Rick Lopp C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
10		Mr. Mike Losey C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
11		Mr. Wayne Kimbel C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
12		Ms. Rebecca Hawes C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
13		Mr. Bob Gilland C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
14		Mr. Fred Burton C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
15		Mr. Kenneth Bishop C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										

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1		Mark Bratcher C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
2		Mr. Barry & Betty Bridwell C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
3		Ms. Kathy Brooks C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
4		Charles & Teresa Abbott C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
5		Ms. Theresa Beam C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
6		Mr. Dennis McClish C/O Wilson Residence 5006 Charleston Pike Jeffersonville IN 47130 (Affected Party)										
7		Ms. Kathryn Loran C/O Wilson Residence 5006 Charleston Pike Jeffersonville IN 47130 (Affected Party)										
8		Elbert & Gladys Collins C/O Wilson Residence 5006 Charleston Pike Jeffersonville IN 47130 (Affected Party)										
9		Joshlen Snelling C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
10		Mr. Robert Meyer 204 Kewanna Dr Jeffersonville IN 47130 (Affected Party)										
11		Mejo Loe 4602 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
12		Mr. John Lois 5032 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
13		Mr. Richard & Kristine F. Lyons 5024 King Rd Jeffersonville IN 47130 (Affected Party)										
14		R.A. Kershner P.O. Box 566 Jeffersonville IN 47130 (Affected Party)										
15		Ms. Kelly Khri 4819 Salem Noble Rd Jeffersonville IN 47130 (Affected Party)										

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1		Kirk Buck 4609 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
2		Mr. Taylor Buckner 4609 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
3		Mr. Frederick Degott 2323 Charleston Pike #44 Jeffersonville IN 47130 (Affected Party)										
4		Mr. Ralph Conn 4314 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
5		Eric & Nysia Green 4606 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
6		Ms. Martha King 5005 Charleston Pike Jeffersonville IN 47130 (Affected Party)										
7		Mr. Bill King 4903 King Rd Jeffersonville IN 47130 (Affected Party)										
8		Mr. Harold & Sharon Kleinert 5318 King Rd Jeffersonville IN 47130 (Affected Party)										
9		Ms. Edna Kring 2307 Bishop Rd Jeffersonville IN 47130 (Affected Party)										
10		Mr. Scharley Batman 5212 Hamburg Pike Jeffersonville IN 47130 (Affected Party)										
11		Amy & Michael Holaday 3102 Crums Lane Jeffersonville IN 47130 (Affected Party)										
12		Ms. Mary Ruth Howard 4607 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
13		J.E. Howard JR. 4607 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
14		Debra & Jason Humes 4605 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
15		Mr. Chez Johnson 2317 Cornwell Dr Jeffersonville IN 47130 (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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Dyan Henley 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
2		Ms. Anne Howard 4607 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
3		Mr. Cerare Howard III 4607 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
4		Mr. Mike Hurt 1501 Utica Pike Jeffersonville IN 47130 (Affected Party)										
5		Ms. Edith Johnson 2405 Cornwell Dr Jeffersonville IN 47130 (Affected Party)										
6		Mr. Bradley Dillon Greenbaum, Doll & McDonald 3300 S. 5th St Louisville KY 40202-3197 (Affected Party)										
7		Mr. Robert Aschbacher 1811 W. Main St Louisville KY 40203 (Affected Party)										
8		Mr. Charles Stottman 1315 Lexington Rd Louisville KY 40204 (Affected Party)										
9		Mr. Robert Bottom Paddlewheel Alliance P.O. Box 35531 Louisville KY 40232-5531 (Affected Party)										
10		Douglas & Michelle Monroe 421 Leavenworth St Manhattan KS 66502-5922 (Affected Party)										
11		Ms. Joanne Thorpe 1020 Wildwood Ave New Albany IN 47150 (Affected Party)										
12		Sellersburg Town Council 316 Utica Street Sellersburg IN 47172 (Local Official)										
13		Ms. Sheila Thornburg 2302 Coopers Lane Sellersburg IN 47172 (Affected Party)										
14		Linda & James Naville, Sr 6408 Hwy 60 Sellersburg IN 47172 (Affected Party)										
15		Ms. Brenda Pulliam 6811 Hwy 311 Sellersburg IN 47172 (Affected Party)										

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1		Marguerite Fraley 7005 Highwat 31 East Sellersburg IN 47172 (Affected Party)										
2		Mr. Rocky Gabbart 2620 Coopers Sellersburg IN 47172 (Affected Party)										
3		Berlin & Naomi Anderson 6823 Highway #311 Sellersburg IN 47172 (Affected Party)										
4		Ms. Herbert & Sue Baker 499 Allhands Ave Sellersburg IN 47172 (Affected Party)										
5		Celene & Brandan Marrow 4608 Fallow Dr Jeffersonville IN 47130 (Affected Party)										
6		Barbara & William Stotts 2803 Victory Court Clarksville IN 47129 (Affected Party)										
7		Sellersburg Public Library 430 N Indiana Ave Sellersburg IN 47172 (Library)										
8		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
9		Mr. Robert Hancock C/O Henley Residence 5020 King Rd Jeffersonville IN 47130 (Affected Party)										
10		Ms. Noelle McCartin C/O Frantz Residence 410 Merryman Dr Jeffersonville IN 47130 (Affected Party)										
11		Katie & Dennie Frantz 410 Merryman Dr Jeffersonville IN 47130 (Affected Party)										
12		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
13		Kay Rykowski Industrial Container Services, LLC 404 Holmes Street Lemont IL 60439 (Source – addl contact)										
14												
15												

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