



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 30, 2011

RE: Insituform Technologies, Inc / 097-31296-00585

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mr. Kyle Rowland
Insituform Technologies, Inc.
17988 Edison Ave.
Chesterfield, MO 63005

December 30, 2011

Re: 097-31296-00585
First Administrative Amendment to
F097-29683-00585

Dear Mr. Rowland

Insituform Technologies, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F097-29683-00585 on March 24, 2011 for a stationary flexible pipeline liner manufacturing facility located at 2130 Stout Field West Dr., Indianapolis, IN 46241. On December 21, 2011, the Office of Air Quality (OAQ) received an application from the source stating:

- (1) that a new mixer (Mixer 4) and new conveyor (Conveyor 4) are going to be constructed in 2012 as part of the CIPP wetout process and
- (2) to change the name of the current Mixer 4 to Mixer 5 and the current conveyor 4 to conveyor 5 of the ILS wetout process.

Relating to construction and operation of a static mixer and wetout conveyor of the same type and will comply with the same applicable requirements and permit terms and conditions as the existing static mixers and wetout conveyors. The addition of Mixer 4 and Conveyor 4 will not change the existing limits specified for the CIPP wetout process. The addition of these units to the permit is considered an administrative amendment pursuant to 326 IAC 2-8-10(a)(14). The entire source will continue to limit VOC emissions to less than one hundred (100) tons per twelve (12) consecutive month period and limit HAP emissions to less than ten (10) tons per single HAP and less than 25 tons per total HAPs per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 not applicable. The addition of these units will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Administrative Amendment F097-29683-00585 (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Conveyors 1 - 3 (CIPP Process)	0.00	0.00	0.00	0.00	0.00	0.24	0.00	0.24	Styrene 0.24
Mixers 1 - 3 (CIPP Process)	0.00	0.00	0.00	0.00	0.00	1.02	0.00	1.02	Styrene 1.02
Conveyor 4 (ILS Process)	0.00	0.00	0.00	0.00	0.00	1.76	0.00	1.76	Styrene 1.76
Mixer 4 (ILS Process)	0.00	0.00	0.00	0.00	0.00	0.26	0.00	0.26	Styrene 0.26
Tanks 1 - 8	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.06	Styrene 0.06
Scrap 1	0.00	0.00	0.00	0.00	0.00	0.53	0.00	0.53	Styrene 0.53
Fugitive 1	0.00	0.00	0.00	0.00	0.00	2.07	0.00	2.07	Styrene 2.07
Total PTE of Entire Source	0.00	0.00	0.00	0.00	0.00	5.95	0.00	5.95	Styrene 5.95
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

This table reflects the PTE before throughput limit of the proposed amendment.

Process/ Emission Unit	Potential to Emit of the Proposed Revision prior to throughput limit (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Conveyor 4 (CIPP Process)	0.00	0.00	0.00	0.00	0.00	2.25	0.00	2.25	Styrene 2.25
Mixers 4 (CIPP Process)	0.00	0.00	0.00	0.00	0.00	9.46	0.00	9.46	Styrene 9.46
Total PTE of Entire Source	0.00	0.00	0.00	0.00	0.00	8.2	0.00	8.2	Styrene 8.2
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

This table reflects the PTE after throughput limit of the proposed amendment, with bold and strikeout showing the changes.

Process/ Emission Unit	Potential To Emit of the Entire Source After Administrative Amendment (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	CO ₂ e**	Total HAPs	Worst Single HAP
Conveyors 1 - 4 (CIPP Process)	0.00	0.00	0.00	0.00	0.00	0.24	0.00	0.00	0.24	Styrene 0.24
Mixers 1 - 4 (CIPP Process)	0.00	0.00	0.00	0.00	0.00	1.02	0.00	0.00	1.02	Styrene 1.02
Conveyor 4-5 (ILS Process)	0.00	0.00	0.00	0.00	0.00	1.76	0.00	0.00	1.76	Styrene 1.76
Mixer 4 5 (ILS Process)	0.00	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.26	Styrene 0.26
Tanks 1 - 8	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.06	Styrene 0.06
Scrap 1	0.00	0.00	0.00	0.00	0.00	0.53	0.00	0.00	0.53	Styrene 0.53
Fugitive 1	0.00	0.00	0.00	0.00	0.00	2.07	0.00	0.00	2.07	Styrene 2.07
Total PTE of Entire Source	0.00	0.00	0.00	0.00	0.00	5.95	0.00	0.00	5.95	Styrene 5.95
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250 NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	400 NA	400 NA	100	400 NA	400 NA	400 NA	400 NA	NA	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ** The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

The following table is the clean version of the above mentioned table:

Process/ Emission Unit	Potential To Emit of the Entire Source After Administrative Amendment (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	CO ₂ e**	Total HAPs	Worst Single HAP

Process/ Emission Unit	Potential To Emit of the Entire Source After Administrative Amendment (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	CO ₂ e**	Total HAPs	Worst Single HAP
Conveyors 1 - 4 (CIPP Process)	0.00	0.00	0.00	0.00	0.00	0.24	0.00	0.00	0.24	0.24
Mixers 1 - 4 (CIPP Process)	0.00	0.00	0.00	0.00	0.00	1.02	0.00	0.00	1.02	1.02
Conveyor 5 (ILS Process)	0.00	0.00	0.00	0.00	0.00	1.76	0.00	0.00	1.76	1.76
Mixer 5 (ILS Process)	0.00	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.26	0.26
Tanks 1 - 8	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.06	0.06
Scrap 1	0.00	0.00	0.00	0.00	0.00	0.53	0.00	0.00	0.53	0.53
Fugitive 1	0.00	0.00	0.00	0.00	0.00	2.07	0.00	0.00	2.07	2.07
Total PTE of Entire Source	0.00	0.00	0.00	0.00	0.00	5.95	0.00	0.00	5.95	Styrene 5.95
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ** The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

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

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

- (a) ~~Three~~**Four (34)** static mixers, identified as Mixer 1, Mixer 2, ~~and Mixer 3~~ **and Mixer 4, Mixers 1, 2 and 3 were** constructed in 2006 **and Mixer 4 is approved for construction in 2012**, using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as 0, 1, 2, 6, 2R and 6R;
- (b) ~~Three~~**Four (34)** wetout conveyors, identified as Conveyor 1, Conveyor 2, ~~and~~ Conveyor 3,

and Conveyor 4, Conveyors 1, 2 and 3 were constructed in 2006 **and Conveyor 4 is approved for construction in 2012**, using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays identified as 0, 1, 2, 6, 2R and 6R;

...
(f) One (1) static mixer, identified as ~~Mixer 4~~**Mixer 5** constructed in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays 0, 1, 2, 6, 2R and 6R;

(g) One (1) wetout conveyor, identified as ~~Conveyor 4~~**Conveyor 5**, constructed in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays 0, 1, 2, 6, 2R and 6R.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) ~~Three~~**Four (34)** static mixers, identified as Mixer 1, Mixer 2, ~~and Mixer 3~~ **and Mixer 4 (Mixers 1, 2 and 3 were** constructed in 2006 **and Mixer 4 is approved for construction in 2012)**, using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as 0, 1, 2, 6, 2R and 6R;
- (b) ~~Three~~**Four (34)** wetout conveyors, identified as Conveyor 1, Conveyor 2, ~~and Conveyor 3~~, **and Conveyor 4 (Conveyors 1, 2 and 3 were** constructed in 2006 **and Conveyor 4 is approved for construction in 2012)**, using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays identified as 0, 1, 2, 6 2R and 6R;
- ...
- (f) One (1) static mixer, identified as ~~Mixer 4~~**Mixer 5**, constructed in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays 0, 1, 2, 6, 2R and 6R;
- (g) One (1) wetout conveyor, identified as ~~Conveyor 4~~**Conveyor 5**, constructed in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays 0, 1, 2, 6, 2R and 6R.

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

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

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

Pursuant to 326 IAC 2-8-4:

...

- (b) The VOC and HAP emission rates from the static mixers, identified as Mixer 1 through **34**, using the CIPP process, shall each not exceed 0.24 pounds per ton of resin throughput.

- (c) The VOC and HAP emission rates from the wetout conveyors, identified as Conveyor 1 through ~~34~~, using the CIPP process, shall each not exceed 0.057 pounds per tons.
- ...
- (g) The VOC and HAP emission rates from the static mixer, identified as Mixer ~~4~~ **45**, using the ILS process, shall each not exceed 0.35 pounds per ton of resin throughput.
- (h) The VOC and HAP emission rates from the wetout conveyor, identified as Conveyor ~~4~~ **45**, using the ILS process, shall each not exceed 2.35 pounds per ton of resin throughput.

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

D.1.3 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1 (a), (d) (f) and (i), the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the resin usage limits established in Condition D.1.1. Records necessary to demonstrate the compliance status shall be available within 30 days of the end of each compliance period.
- (1) The amount of resin used by Tanks 1 through 8, Mixers 1 through ~~34~~, Conveyors 1 through ~~34~~, ~~Mixer 4~~ **Mixer 5**, and ~~Conveyor 4~~ **Conveyor 5**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used each month and each compliance period;

...

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: F097-29683-00585
Facility: Mixers 1 through ~~34~~, Conveyors 1 through ~~34~~
Parameter: Resin throughput the CIPP process
Limit: <8,500 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

...

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: F097-29683-00585
Facility: ~~Mixers 4, Conveyor 4~~ **Mixer 5, Conveyor 5**
Parameter: Resin throughput the ILS process
Limit: <1,500 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

...

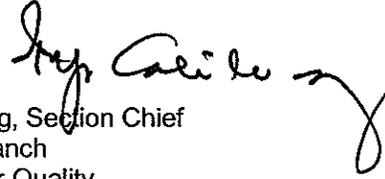
All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions on this matter, please contact Deena Patton, of my staff, at 317-234-5400 or 1-800-451-6027, and ask for extension 4-5400

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit

IC /DP

cc: File - Marion County
Marion County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Federally Enforceable State Operating Permit
Renewal
OFFICE OF AIR QUALITY**

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

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F097-29683-00585	
Issued by: <i>Original document signed by</i> Alfred C. Dumauual, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 24, 2011 Expiration Date: March 24, 2021

First Administrative Amendment No.: F097-31296-00585	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 30, 2011 Expiration Date: March 24, 2021

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

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

- C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
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Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

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

Stratospheric Ozone Protection

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

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

- D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
[326 IAC 8-2-12] [326 IAC 8-1-6] [326 IAC 2-4.1]
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Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	2130 Stout Field West Drive, Indianapolis, Indiana 46241
General Source Phone Number:	(636) 530-8712
SIC Code:	1623 (Water, Sewer, Pipeline and Communications and Power Line Construction)
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Four (4) static mixers, identified as Mixer 1, Mixer 2, Mixer 3 and Mixer 4 (Mixers 1, 2 and 3 were constructed in 2006 and Mixer 4 is approved for construction in 2012), using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as 0, 1, 2, 6, 2R and 6R;
- (b) Four (4) wetout conveyors, identified as Conveyor 1, Conveyor 2, Conveyor 3, and Conveyor 4 (Conveyors 1, 2 and 3 were constructed in 2006 and Conveyor 4 is approved for construction in 2012), using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as 0, 1, 2, 6, 2R and 6R;
- (c) One (1) scrap resin building, identified as Scrap 1, constructed in 2006, with a maximum capacity of 2 barrels per day, exhausting through stack 9;
- (d) Eight (8) liquid resin storage tanks, constructed in 2006, with a capacity of 5, 880 gallons each, containing no more than 45 percent styrene by weight, identified as Tank 1 through 8, each with a maximum throughput of 1800 gallons per hour, exhausting through stacks 1 through 8;
- (e) One fugitive area, constructed in 2006, consisting of valves, pumps and flanges, identified as Fugitive 1;
- (f) One (1) static mixer, identified as Mixer 5, constructed in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays 0, 1, 2, 6, 2R and 6R;

- (g) One (1) wetout conveyor, identified as Conveyor 5, constructed in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays 0, 1, 2, 6, 2R and 6R.

A.3 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F097-29683-00585, is issued for a fixed term of ten (10) 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]

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 [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this

permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

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

B.12 Emergency Provisions [326 IAC 2-8-12]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality,
Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

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

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

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

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F097-29683-00585 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a

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

Request for renewal shall be submitted to:

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

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

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

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

and

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

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

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

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

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to

assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

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

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the 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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Four (4) static mixers, identified as Mixer 1, Mixer 2, Mixer 3 and Mixer 4 (Mixers 1, 2 and 3 were constructed in 2006 and Mixer 4 is approved for construction in 2012), using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as 0, 1, 2, 6, 2R and 6R;
- (b) Four (4) wetout conveyors, identified as Conveyor 1, Conveyor 2, Conveyor 3, and Conveyor 4 (Conveyors 1, 2 and 3 were constructed in 2006 and Conveyor 4 is approved for construction in 2012), using the CIPP wetout process, each with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays, identified as 0, 1, 2, 6, 2R and 6R;
- (c) One (1) scrap resin building, identified as Scrap 1, constructed in 2006, with a maximum capacity of 2 barrels per day, exhausting through stack 9;
- (d) Eight (8) liquid resin storage tanks, constructed in 2006, with a capacity of 5, 880 gallons each, containing no more than 45 percent styrene by weight, identified as Tank 1 through 8, each with a maximum throughput of 1800 gallons per hour, exhausting through stacks 1 through 8;
- (e) One fugitive area, constructed in 2006, consisting of valves, pumps and flanges, identified as Fugitive 1;
- (f) One (1) static mixer, identified as Mixer 5, constructed in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays 0, 1, 2, 6, 2R and 6R;
- (g) One (1) wetout conveyor, identified as Conveyor 5, constructed in 2008, using the ILS wetout process, with a maximum throughput of 9 tons/hour of liquid resin, exhausting to bays 0, 1, 2, 6, 2R and 6R.

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

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

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

Pursuant to 326 IAC 2-8-4:

- (a) The annual resin throughput from the CIPP process shall be limited to less than 8,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The VOC and HAP emission rates from the static mixers, identified as Mixer 1 through 4, using the CIPP process, shall each not exceed 0.24 pounds per ton of resin throughput.
- (c) The VOC and HAP emission rates from the wetout conveyors, identified as Conveyor 1 through 4, using the CIPP process, shall each not exceed 0.057 pounds per tons.

- (d) The annual amount of scrap resin combined from the CIPP and ILS processes shall be limited to less than 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (e) The VOC and HAP emission rates from the CIPP and ILS process scrap, exhausting in the scrap resin building, identified as Scrap 1, shall each not exceed 21.23 pounds per ton of scrap resin.
- (f) The annual resin throughput from the ILS process shall be limited to less than 1,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (g) The VOC and HAP emission rates from the static mixer, identified as Mixer 5, using the ILS process, shall each not exceed 0.35 pounds per ton of resin throughput.
- (h) The VOC and HAP emission rates from the wetout conveyor, identified as Conveyor 5, using the ILS process, shall each not exceed 2.35 pounds per ton of resin throughput.
- (i) The annual resin throughput from the liquid resin storage tanks, identified as Tanks 1 through 8, shall be limited to less than 10,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plans required by this condition.

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

D.1.3 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1 (a), (d) (f) and (i), the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the resin usage limits established in Condition D.1.1. Records necessary to demonstrate the compliance status shall be available within 30 days of the end of each compliance period.
 - (1) The amount of resin used by Tanks 1 through 8, Mixers 1 through 4, Conveyors 1 through 4, Mixer 5, and Conveyor 5. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used each month and each compliance period;
 - (2) The amount of scrap resin placed in Scrap 1 each month and each compliance period.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.4 Reporting Requirements

A quarterly report and a summary of the information to document the compliance status with Condition D.1.1(a), (d), (f), and (i) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: F097-29683-00585

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

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

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: F097-29683-00585

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: F097-29683-00585
Facility: Mixers 1 through 4, Conveyors 1 through 4
Parameter: Resin throughput the CIPP process
Limit: <8,500 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: F097-29683-00585
Facility: Mixer 5, Conveyor 5
Parameter: Resin throughput the ILS process
Limit: <1,500 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: F097-29683-00585
Facility: Scrap Resin Building
Parameter: Scrap Resin throughput
Limit: <50 tons of scrap resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: F097-29683-00585
Facility: Tanks 1 through 8
Parameter: Liquid Resin throughput
Limit: <10,000 tons of resin throughput per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

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

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: F097-29683-00585

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: F097-31296-00585
Reviewer: Deena Patton
Date: December 2011

SUMMARY OF CALCULATED POTENTIAL EMISSION RATES - BEFORE CONTROLS

Emission Unit	PM	PM-10	SO2	NOx	VOC	CO2e	CO	HAPs	Worst Case HAPs
Conveyors 1 - 4* (CIPP Process)	0	0	0	0	8.99	0.00	0	8.99	6.74 Styrene
Mixers 1 - 4* (CIPP Process)	0	0	0	0	37.84	0.00	0	37.84	28.38 Styrene
Conveyor 5 ** (ILS Process)	0	0	0	0	92.64	0.00	0	92.64	92.64 Styrene
Mixers 5 ** (ILS Process)	0	0	0	0	13.80	0.00	0	13.80	13.80 Styrene
Tanks 1 - 8	0	0	0	0	0.51	0.00	0	0.51	0.51 Styrene
Scrap 1	0	0	0	0	1.75	0.00	0	1.75	1.75 Styrene
Fugitive 1	0	0	0	0	2.07	0.00	0	2.07	2.07 Styrene
Total	0.00	0.00	0.00	0.00	157.59	0.00	0.00	157.59	145.89

*Conveyor and Mixer 4 are to be constructed in 2012

** Conveyor 5 and Mixer 5 were formerly Conveyor 4 and Mixer 4 in F097-29683-00585, changed the name at the request of the Source.

SUMMARY OF CALCULATED EMISSION RATES with LIMITED THROUGHPUT

Emission Unit	PM	PM-10	SO2	NOx	VOC	CO2e	CO	HAPs	Worst Case HAPs
Conveyors 1 - 4* (CIPP Process)	0	0	0	0	0.24	0.00	0	0.24	0.24 Styrene
Mixers 1 - 4* (CIPP Process)	0	0	0	0	1.02	0.00	0	1.02	1.02 Styrene
Conveyor 5** (ILS Process)	0	0	0	0	1.76	0.00	0	1.76	1.76 Styrene
Mixer 5** (ILS Process)	0	0	0	0	0.26	0.00	0	0.26	0.26 Styrene
Tanks 1 - 8	0	0	0	0	0.06	0.00	0	0.06	0.06 Styrene
Scrap 1	0	0	0	0	0.53	0.00	0	0.53	0.53 Styrene
Fugitive 1	0	0	0	0	2.07	0.00	0	2.07	2.07 Styrene
Total	0.00	0.00	0.00	0.00	5.95	0.00	0.00	5.95	5.95

*Conveyor and Mixer 4 are to be constructed in 2012

** Conveyor 5 and Mixer 5 were formerly Conveyor 4 and Mixer 4 in F097-29683-00585, changed the name at the request of the Source.

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

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: F097-31296-00585
Reviewer: Deena Patton
Date: December 2011

CIPP Process

EU ID	Maximum Resin Throughput (tons/hr)	Emission Factor (lbs/ton)	VOC/HAP emissions (lbs/hr)	*VOC/HAP emissions (tons/yr)
Wetout Conveyor 1	9	0.057	0.513	2.25
Wetout Conveyor 2	9	0.057	0.513	2.25
Wetout Conveyor 3	9	0.057	0.513	2.25
New Wetout Conveyor 4	9	0.057	0.513	2.25
Total =			2.052	8.99

FESOP Throughput Limit = 8,500 tons/year

EU ID	Limited Annual Resin Throughput (tons/yr)	Emission Factor (lbs/ton)	Limited VOC/HAP emissions (lbs/yr)	**Limited VOC/HAP emissions (tons/yr)
Wetout Conveyors 1 - 4	8,500	0.057	484.5	0.24

ILS Process

EU ID	Maximum Resin Throughput (tons/hr)	Emission Factor (lbs/ton)	VOC/HAP emissions (lbs/hr)	*VOC/HAP emissions (tons/yr)
Wetout Conveyor 5	9	2.35	21.15	92.64

FESOP Throughput Limit = 1,500 tons/year

EU ID	Limited Annual Resin Throughput (tons/yr)	Emission Factor (lbs/ton)	Limited VOC/HAP emissions (lbs/yr)	**Limited VOC/HAP emissions (tons/yr)
Wetout Conveyor 5	1,500	2.35	3525	1.76

Methodology

Styrene is the only VOC/HAP emitted.

Emission Factor for the CIPP process were provided by an IDEM approved stack test November 2006.

Emission Factor for the ILS process were provided by an IDEM approved stack test August 2008.

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

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

Only one process can operate at a time.

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

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: F097-31296-00585
Reviewer: Deena Patton
Date: December 2011

CIPP Process

EU ID	Maximum Resin Throughput (tons/hr)	Emission Factor (lbs/ton)	VOC/HAP emissions (lbs/hr)	*VOC/HAP emissions (tons/yr)
Mixer 1	9	0.24	2.16	9.46
Mixer 2	9	0.24	2.16	9.46
Mixer 3	9	0.24	2.16	9.46
New Mixer 4	9	0.24	2.16	9.46
Total =			8.64	37.84

FESOP Throughput Limit = 8,500 tons/year

	Limited Resin Throughput (tons/yr)	Emission Factor (lbs/ton)	Limited VOC/HAP emissions (lbs/yr)	**Limited VOC/HAP emissions (tons/yr)
Mixers 1 - 4	8,500	0.24	2040	1.02

ILS Process

EU ID	Maximum Resin Throughput (tons/hr)	Emission Factor (lbs/ton)	VOC/HAP emissions (lbs/hr)	*VOC/HAP emissions (tons/yr)
Mixer 5	9	0.35	3.15	13.80

FESOP Throughput Limit = 1,500 tons/year

	Limited Resin Throughput (tons/yr)	Emission Factor (lbs/ton)	Limited VOC/HAP emissions (lbs/yr)	**Limited VOC/HAP emissions (tons/yr)
Mixer 5	1,500	0.35	525	0.26

Methodology

Styrene is the only VOC/HAP emitted.

Emission Factor for the CIPP process were provided by an IDEM approved stack test November 2006.

Emission Factor for the ILS process were provided by an IDEM approved stack test August 2008.

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

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

Only one process can operate at a time.

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

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: F097-31296-00585
Reviewer: Deena Patton
Date: December 2011

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

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

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

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

**Appendix A: VOC& HAP Emission Calculations
From Scrap 1 and Fugitive 1**

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: F097-31296-00585
Reviewer: Deena Patton
Date: December 2011

Scrap 1

*Emission Factor = 21.23 lbs VOC/ton

0.5% of the total throughput is scrap

Maximum throughput = 10,000 tons per year

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

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

Fugitive1

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

Methodology

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

*Emission Factor was taken from an approved IDEM stack test dated November 2006.

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

"Table2-1: SOCOMI Average Emission Factors"

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

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: F097-31296-00585
Reviewer: Deena Patton
Date: December 2011

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.0	1000	0.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0	0.0	0.0

*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/1,000 MMBtu

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

See page 2 for HAPs emissions calculations.

updated 7/11

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

Company Name: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: F097-31296-00585
Reviewer: Deena Patton
Date: December 2011

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	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00

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	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00

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: Insituform Technologies, Inc.
Address City IN Zip: 2130 Stout Field West Drive, Indianapolis, IN 46241
Permit Number: F097-31296-00585
Reviewer: Deena Patton
Date: December 2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	0	0.0	0.0
Summed Potential Emissions in tons/yr	0		
CO2e Total in tons/yr	0		

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.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Kyle Rowland
Insituform Technologies, Inc.
17988 Edison Ave
Chesterfield, MO 63005

DATE: December 30, 2011

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

SUBJECT: Final Decision
FESOP
097-31296-00585

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:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 12/30/2011 Insituform Technologies, Inc. 097-31296-00585 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Kyle Rowland Insituform Technologies, Inc. 17988 Edison Ave Chesterfield MO 63005 (Source CAATS)										
2		Dennis Orszulak Plant Mgr Insituform Technologies, Inc. 2130 Stout Field W Dr Indianapolis IN 46241 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)										
7		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
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