



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: August 7, 2014

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

Source Name: Tradebe Treatment and Recycling LLC

Permit Level: Title V Minor Permit Modification

Permit Number: 089-34282-00345

Source Location: 4343 Kennedy Avenue, East Chicago, Indiana

Type of Action Taken: Modification at an existing source

## **Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 34282.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

*(continues on next page)*

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

August 7, 2014

Ms. Tita LaGrimas  
Tradebe Treatment and Recycling, LLC  
4343 Kennedy Avenue  
East Chicago, IN 46312

Re: 089-34282-00345  
Minor Permit Modification to  
Part 70 Renewal No.: T089-29424-00345

Dear Tita:

Tradebe Treatment and Recycling, LLC was issued Part 70 Operating Permit Renewal No. T089-29424-00345 on February 25, 2011 for a stationary waste management, recycling and fuel processing source located at 4343 Kennedy Avenue, East Chicago, IN 46312. An application requesting changes to this permit was received on February 27, 2014. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

- Attachment A NESHAP for Benzene Waste Operations [40 CFR Part 61, Subpart FF]
- Attachment B NESHAP for National Emission Standard from Off-Site Waste and Recovery Operations [40 CFR Part 63, Subpart DD]
- Attachment C NESHAP for Equipment Leaks (Fugitive Emission Sources) of Benzene [40 CFR Part 61, Subpart J]

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl).

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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Tradebe Treatment and Recycling, LLC  
East Chicago, Indiana  
Permit Reviewer: Heath Hartley

Page 2 of 2  
MPM No.: 089-34282-00345

If you have any questions on this matter, please contact Heath Hartley of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Heath Hartley or extension 2-8217 or dial (317) 232-8217.

Sincerely,



Nathan C. Bell, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit, Technical Support Document and Appendix A

NB/hh

cc: File - Lake County  
Lake County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
IDEM Northwest Regional Office



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*Commissioner*

**Part 70 Operating Permit Renewal  
OFFICE OF AIR QUALITY**

**Tradebe Treatment and Recycling LLC  
4343 Kennedy Avenue  
East Chicago, Indiana 46312**

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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.

Operation Permit No. T089-29424-00345	
Issued by: Original Signed Tripurari P. Sinha, Ph.D., Section Chief Permits Branch, Office of Air Quality	Issuance Date: February 25, 2011  Expiration Date: February 25, 2016

First Administrative Amendment No. 089-32233-00345, issued on August 29, 2012.  
Second Administrative Amendment No. 089-33257-00345, issued on June 20, 2013.

First Minor Permit Modification No. 089-34282-00345	
Issued by:   Nathan Bell, Section Chief, Permits Branch Office of Air Quality	Issuance Date: August 7, 2014  Expiration Date: February 25, 2016

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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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary waste management, recycling and fuel processing source.

Source Address:	4343 Kennedy Avenue, East Chicago, Indiana 46312
General Source Phone Number:	(219) 397-3951
SIC Code:	7389 (Business Services, Not Elsewhere Classified)
County Location:	Lake
Source Location Status:	Nonattainment for ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major 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 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Hazardous waste material (HWM) tank storage, identified as Unit 1, described as follows:
- (1) HWM mix, blend, and storage tanks, identified as 1R, 4, 18, 19, 20, 21, 22, and 23, with nominal gallon capacities of 12,600, 12,690, 20,353, 20,353, 19,688, 20,353, 20,353, and 20,353, respectively, constructed in 2008, 1970, 1993, 1993, 1993, 1993, 1993, and 1993, respectively, collectively using three (3) sets of carbon adsorbers with the sets used alternately, each set with two (2) carbon canisters in series for VOC control, using a closed-loop vapor exchange system to minimize air emissions, and exhausting to one stack, identified as HWM Storage/Blending Stack.
  - (2) HWM receiving, blending and storage tank, identified as 29, with a capacity of 21,000 gallons, constructed in 2000, using one (1) carbon adsorber unit consisting of two (2) carbon canisters in series for VOC control, using a closed-loop vapor exchange system to minimize air emissions, and exhausting to stack TK 29.
  - (3) HWM blending and mixing tanks, identified as 6 and 7, with gallon capacities of 4,386 and 2,900, respectively, constructed in 1989 and 1952, respectively, collectively using a flare as primary VOC control and carbon canisters as backup VOC control.
  - (4) One (1) hydropulper tank, identified as Tank 24 HP, constructed in 1993, with a capacity of 3,500 gallons using one (1) carbon adsorber unit consisting of two (2) carbon canisters and one (1) feed hopper using a separate carbon control system.
- (b) Hazardous waste fuel (HWF), hazardous waste for tolling and organic liquid product receiving and shipping operations located at Area 2, Area 8 and the Rail line, including organic product receiving/shipping, identified as Unit 2, with a maximum capacity of 7,200

gallons of liquid material per hour, constructed in 1991, and consisting of the following operations:

- (1) Loading and unloading of railcars, occurring outdoors and unenclosed, and using submerged filling;
  - (2) Loading and unloading of tank trucks, occurring semi-enclosed in a three-sided shed, and at separate unenclosed areas, and using bottom filling; and
  - (3) Unloading of various sizes of drums and totes.
- (c) One (1) materials manual lab packing, depacking, and bulking operation, identified as Unit 4, with a maximum capacity of 27,375 pack containers per year, constructed in 1992, including three insignificant booths located in Area 5 in addition to the following equipment:
- (1) One (1) booth for manual lab packing, depacking and bulking of organic materials, identified as Lab Pack Booth 1, using a single carbon canister for VOC control, and exhausting to stack LP S1.
- (d) One (1) Solids Distillation System (SDS), constructed in 2004, with a maximum throughput rate of 4 tons of waste per hour, consisting of:
- (1) One (1) SDS Shredder, approved for modification in 2013, using a variable speed fan and carbon adsorption system for VOC control, exhausting to stacks SDS 01(a) and (b).
  - (2) One (1) Anaerobic Thermal Desorption System enclosed feed conveyor under nitrogen blanketing, and enclosed in a chilled jacket, using a carbon adsorption system for VOC control, exhausting to SDS 03.
  - (3) One (1) Anaerobic Thermal Desorption Unit, identified as ATDU, with one (1) 10 MMBtu/hr natural gas fired heater, exhausting to stack SDS 02.
  - (4) One (1) Oil-Water Separator, using a carbon adsorption system for VOC control, exhausting to stack SDS 03.
  - (5) One (1) water tank, using a carbon adsorption system for VOC control, exhausting to stack SDS 08.
  - (6) One (1) Vapor Recovery Unit (VRU), using an enclosed John Zink flare with a demister (and a carbon adsorption system as backup) for VOC control, exhausting to stack SDS 07.
  - (7) One (1) solids shaker and conveyor system, using two (2) baghouses for particulate control, exhausting to stacks SDS 04 and SDS 09.
- (e) One (1) Distillation Unit, constructed in 2004, with a maximum throughput rate of 1.0 tons of liquid waste per hour, controlled by a carbon adsorption system, and exhausting to stack SDS 05.
- (f) One (1) condensed liquid tank, identified as Tank 55, constructed in 2004, with a nominal capacity of 20,000 gallons, used to collect oil from the oil-water separator, controlled by a carbon Adsorption system, and exhausting to stack SDS 08.
- (g) Three (3) RCRA hazardous waste tanks, identified as Tanks 52 through 54, constructed in 2004, each with a nominal capacity of 12,000 gallons, controlled by a carbon adsorption system, and exhausting to stack SDS 08.

- (h) Five (5) product tanks, identified as Tanks 57 through 61, constructed in 1998, with nominal capacities of 20,000 gallons, 20,000 gallons, 6,000 gallons, 6,000 gallons and 20,000 gallons, respectively, each controlled by a carbon adsorption system containing two (2) carbon canisters, and exhausting to stacks LDS 09a-09e.
- (i) One (1) Pot Still, constructed in 2007, with a maximum throughput rate of 70 gallons of liquid waste per hour, controlled by a carbon adsorption system, and exhausting to stack SDS 10.
- (j) One (1) Thin Film Evaporator, constructed in 2008, with a 2.4 million Btu/hr natural gas fired burner and a maximum throughput rate of 390 gallons of liquid waste per hour, controlled by a carbon adsorption system, and exhausting to stack S11.
- (k) Six (6) product tanks located in Area 1, identified as Tanks 62 through 67, permitted in 2008 with nominal capacities of 12,000 gallons per tank, controlled by a carbon adsorption system, and exhausted to stacks S12-S17, respectively. Also included is a molecular sieve, installed in 2010.
- (l) One (1) degassing operation, constructed in 2008 and approved in 2014 for modification, with a maximum degassing rate of 405.8 tons of gasses per year. The degassing operation includes a reactor tank into which gasses are vented and a pressurized "shock" tank that will condense gasses into liquids for collection and offsite shipment, with remaining gasses controlled by a flare or carbon canisters.

A.3 Specifically Regulated Insignificant Activities  
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]
- (b) Paved roads and parking lots with public access. [326 IAC 6-4]
- (c) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO<sub>2</sub>; 5 lb/hr or 25 lb/day NO<sub>x</sub>; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
  - (1) One (1) booth for manual unpacking of dry chemical materials, identified as LP B4 of Unit 4, with a maximum capacity of 200 pounds per day, using a baghouse for particulate control, and exhausting to stack LP S4. [326 IAC 6-3-2]
  - (2) Two (2) packing booths, Lab Pack Booth 2 and Lab Pack Booth 3, used to handle acids and caustics, using a wet scrubber for control. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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

### B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

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- (a) This permit, T 089-29424-00345, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

### B.5 Severability [326 IAC 2-7-5(5)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), 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) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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.11 Emergency Provisions [326 IAC 2-7-16]**

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- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, or Northwest Regional Office 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  
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

- (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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-4(c)(8) 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 2-7 and any other applicable rules.
- (g) 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.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.  
  
This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T 089-29424-00345 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.18 Permit Revision Under Economic Incentives and Other Programs**  
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) 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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b)(1) and (c)(1). 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 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.20 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.22** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.23** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), 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.24** Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(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 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 twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Reserved

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

## Testing Requirements [326 IAC 2-7-6(1)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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]

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

## Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

### C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
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, 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, 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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. The analog instrument shall be capable of measuring values outside of the normal range.
- (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 2-7-5][326 IAC 2-7-6]**

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [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 2-7-5] [326 IAC 2-7-6]

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 2-7-5][326 IAC 2-7-6]**

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
- (1) starting in 2004 and every three (3) years thereafter, and
  - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

**C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (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. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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) Hazardous waste material (HWM) tank storage, identified as Unit 1, described as follows:
- (1) HWM mix, blend, and storage tanks, identified as 1R, 4, 18, 19, 20, 21, 22, and 23, with nominal gallon capacities of 12,600, 12,690, 20,353, 20,353, 19,688, 20,353, 20,353, and 20,353, respectively, constructed in 2008, 1970, 1993, 1993, 1993, 1993, 1993, 1993, and 1993, respectively, collectively using three (3) sets of carbon adsorbers with the sets used alternately, each set with two (2) carbon canisters in series for VOC control, using a closed-loop vapor exchange system to minimize air emissions, and exhausting to one stack, identified as HWM Storage/Blending Stack.
  - (2) HWF receiving, blending and storage tank, identified as 29, with a capacity of 21,000 gallons, constructed in 2000, using one (1) carbon adsorber unit consisting of two (2) carbon canisters in series for VOC control, using a closed-loop vapor exchange system to minimize air emissions, and exhausting to stack TK 29.
  - (3) HWF blending and mixing tanks, identified as 6 and 7, with gallon capacities of 4,386 and 2,900, respectively, constructed in 1989 and 1952, respectively, collectively using a flare as primary VOC control and carbon canisters as backup VOC control.
  - (4) One (1) hydropulper tank, identified as Tank 24 HP, constructed in 1993, with a capacity of 3,500 gallons using one (1) carbon adsorber unit consisting of two (2) carbon canisters and one (1) feed hopper using a separate carbon control system.
- (b) Hazardous waste fuel (HWF), hazardous waste for tolling and organic liquid product receiving and shipping operations located at Area 2, Area 8 and the Rail line, including organic product receiving/shipping, identified as Unit 2, with a maximum capacity of 7,200 gallons of liquid material per hour, constructed in 1991, and consisting of the following operations:
- (1) Loading and unloading of railcars, occurring outdoors and unenclosed, and using submerged filling;
  - (2) Loading and unloading of tank trucks, occurring semi-enclosed in a three-sided shed, and at separate unenclosed areas, and using bottom filling; and
  - (3) Unloading of various sizes of drums and totes.
- (c) One (1) materials manual lab packing, depacking, and bulking operation, identified as Unit 4, with a maximum capacity of 27,375 pack containers per year, constructed in 1992, including three insignificant booths located in Area 5 in addition to the following equipment:
- (1) One (1) booth for manual lab packing, depacking and bulking of organic materials, identified as Lab Pack Booth 1, using a single carbon canister for VOC control, and exhausting to stack LP S1.
- (d) One (1) Solids Distillation System (SDS), constructed in 2004, with a maximum throughput rate of 4 tons of waste per hour, consisting of:
- (1) One (1) SDS Shredder, approved for modification in 2013, using a variable speed fan and carbon adsorption system for VOC control, exhausting to stacks SDS 01(a) and (b).
  - (2) One (1) Anaerobic Thermal Desorption System enclosed feed conveyor under nitrogen blanketing, and enclosed in a chilled jacket, using a carbon adsorption system for VOC control, exhausting to SDS 03.

- (3) One (1) Anaerobic Thermal Desorption Unit, identified as ATDU, with one (1) 10 MMBtu/hr natural gas fired heater, exhausting to stack SDS 02.
- (4) One (1) Oil-Water Separator, using a carbon adsorption system for VOC control, exhausting to stack SDS 03.
- (5) One (1) water tank, using a carbon adsorption system for VOC control, exhausting to stack SDS 08.
- (6) One (1) Vapor Recovery Unit (VRU), using an enclosed John Zink flare with a demister (and a carbon adsorption system as backup) for VOC control, exhausting to stack SDS 07.
- (7) One (1) solids shaker and conveyor system, using two (2) baghouses for particulate control, exhausting to stacks SDS 04 and SDS 09.
- (e) One (1) Distillation Unit, constructed in 2004, with a maximum throughput rate of 1.0 tons of liquid waste per hour, controlled by a carbon adsorption system, and exhausting to stack SDS 05.
- (f) One (1) condensed liquid tank, identified as Tank 55, constructed in 2004, with a nominal capacity of 20,000 gallons, used to collect oil from the oil-water separator, controlled by a carbon Adsorption system, and exhausting to stack SDS 08.
- (g) Three (3) RCRA hazardous waste tanks, identified as Tanks 52 through 54, constructed in 2004, each with a nominal capacity of 12,000 gallons, controlled by a carbon adsorption system, and exhausting to stack SDS 08.
- (h) Five (5) product tanks, identified as Tanks 57 through 61, constructed in 1998, with nominal capacities of 20,000 gallons, 20,000 gallons, 6,000 gallons, 6,000 gallons and 20,000 gallons, respectively, each controlled by a carbon adsorption system containing two (2) carbon canisters, and exhausting to stacks LDS 09a-09e.
- (i) One (1) Pot Still, constructed in 2007, with a maximum throughput rate of 70 gallons of liquid waste per hour, controlled by a carbon adsorption system, and exhausting to stack SDS 10.
- (j) One (1) Thin Film Evaporator, constructed in 2008, with a 2.4 million Btu/hr natural gas fired burner and a maximum throughput rate of 390 gallons of liquid waste per hour, controlled by a carbon adsorption system, and exhausting to stack S11.
- (k) Six (6) product tanks located in Area 1, identified as Tanks 62 through 67, permitted in 2008 with nominal capacities of 12,000 gallons per tank, controlled by a carbon adsorption system, and exhausted to stacks S12-S17, respectively. Also included is a molecular sieve, installed in 2010.
- (l) One (1) degassing operation, constructed in 2008 and approved in 2014 for modification, with a maximum degassing rate of 405.8 tons of gasses per year. The degassing operation includes a reactor tank into which gasses are vented and a pressurized "shock" tank that will condense gasses into liquids for collection and offsite shipment, with remaining gasses controlled by a flare or carbon canisters.

(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 2-7-5(1)]**

#### **D.1.1 Emission Offset [326 IAC 2-3][326 IAC 8-1-6]**

- (a) The IDEM, OAQ has information that indicates that several facilities described in this section may be subject to the requirements of 326 IAC 2-3 (Emission Offset),

326 IAC 8-1-6 (BACT), and 326 IAC 8-7. Specifically, IDEM, OAQ questions the efficiency of the capture system associated with the carbon controls on Lab Pack Booth 1. Also, IDEM, OAQ has been unable to validate the source's calculations for stack emissions from these facilities. Therefore, the Permit Shield provided in Section B of this permit does not apply to Lab Pack Booth 1 with regards to 326 IAC 2-3, 326 IAC 8-1-6 and 326 IAC 8-7. Once this matter is resolved, the OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to address the aforementioned rules, and a schedule for achieving compliance with any requirements.

- (b) Pursuant to MSM 089-15970-00345, issued December 2, 2003, and MPM 089-18513-00345, issued February 4, 2004, and as revised by this Part 70 permit, the VOC emissions from the SDS shredder, Solids Distillation System and Distillation Unit shall not exceed the emission limits listed in the table below:

Unit ID	Stack(s) ID	VOC Emission Limit (lb/hr)
SDS Shredder	SDS 01(a) and (b).	0.028, total
Solids Distillation System*	SDS 02, SDS 03, SDS 04, SDS 07, SDS 08, and SDS 09	0.169, total
Distillation Unit	SDS 05	0.014

\* Not including the SDS Shredder

Compliance with these limits is equivalent to less than or equal to VOC emissions of 0.92 tons per year. Combined with the VOC emissions from product tanks 02 through 04, condensed liquid tank 01 and the insignificant combustion units, the VOC emissions from the modification permitted via MSM 089-15970-00345, issued December 2, 2003, are equal to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) are not applicable to these units.

**D.1.2 Particulate Emission Limitations for for Lake County [326 IAC 6.8-1]**

Pursuant to 326 IAC 6.8-1-2, particulate matter from the shaker and conveyor system section of the Solids Distillation System (exhausting to stacks SDS 04 and SDS 09) shall not exceed 0.03 grain per dry standard cubic foot.

**D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-9]**

Pursuant to 326 IAC 8-9, the following applies to HWF mix blend and storage tanks 1R, 4, 18, 19, 20, 21, 22, and 23, HWF blending and storage tanks 6 and 7, tank 24HP, tank 25HD, HWF receiving and storage tank 29, RCRA hazardous waste tanks 52, 53, 54 and 68, condensed liquid tank 55 and product tanks 57 through 67:

- (a) The Permittee shall maintain records of the following for the life of each vessel:
- (1) The vessel identification number;
  - (2) The vessel dimensions;
  - (3) The vessel capacity; and
  - (4) A description of the emission control equipment for each vessel described in 326 IAC 8-9-4(a) and 4(b), if applicable, or a schedule for installation of emission control equipment on vessels described in 326 IAC 8-9-4(a) and 4(b), if applicable, with a certification that the emission control equipment meets the applicable standards.
- (b) A report containing the information described in (a) shall be submitted to IDEM, OAQ within 30 days of permit issuance.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

### Compliance Determination Requirements

#### D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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In order to determine the applicability of 326 IAC 8-1-6 and 326 IAC 8-7, the Permittee shall perform VOC testing on Lab Pack Booth 1 on or before December 6, 2012, utilizing methods approved by the Commissioner. Testing shall be performed to determine VOC capture and destruction efficiency and shall be conducted in accordance with Section C - Performance Testing.

#### D.1.6 Emissions Controls [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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In order to ensure compliance with Condition D.1.2:

- (1) The baghouse shall be in operation and control particulate emissions at all times that the shaker and conveyor system section of the Anaerobic Thermal Desorption System is in operation.
- (2) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.7 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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- (a) Once per day visible emission notations of the stack exhaust from the shaker and conveyor system section of the Solids Distillation System (exhausting to stacks SDS 04 and SDS 09) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### D.1.8 Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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- (a) The Permittee shall monitor the pressure drop across the baghouses used in conjunction with the shaker and conveyor system section of the Solids Distillation System, at least once per day when the shaker and/or conveyor system is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the

Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 2.0 and 14.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months.

#### **D.1.9 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, failed units and the associated process shall be shut down immediately until the failed unit have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.1.10 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.3 - Volatile Organic Compounds, the Permittee shall maintain the records specified in that condition.
- (b) To document the compliance status with Condition D.1.7 - Visible Emissions Notations, the Permittee shall maintain once per day records of the visible emission notations. The Permittee shall include in its daily record when any of these records are not taken and the reason (e.g., the process did not operate that day).
- (c) To document the compliance status with Condition D.1.8 - Parametric Monitoring, the Permittee shall maintain once per day records of the baghouse pressure drop readings. The Permittee shall include in its daily record when any of these records are not taken and the reason (e.g., the process did not operate that day).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### **Emissions Unit Description:** Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-8]
- (b) Paved roads and parking lots with public access. [326 IAC 6-4]
- (c) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO<sub>2</sub>; 5 lb/hr or 25 lb/day NO<sub>x</sub>; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
  - (1) One (1) booth for manual unpacking of dry chemical materials, identified as LP B4 of Unit 4, with a maximum capacity of 200 pounds per day, using a baghouse for particulate control, and exhausting to stack LP S4. [326 IAC 6-3-2]
  - (2) Two (2) packing booths, Lab Pack Booth 2 and Lab Pack Booth 3, used to handle acids and caustics, using a wet scrubber for control. [326 IAC 6-3-2]

(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 2-7-5(1)]**

#### D.2.1 Particulate Emission Limitations for Lake County [326 IAC 6.8-1]

Pursuant to 326 IAC 6.8-1-2, particulate matter from LP B4 of Unit 4, Lab Pack Booth 2 and Booth 3 shall not exceed 0.03 grain per dry standard cubic foot, each.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980:

- (a) The Permittee of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:
  - (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
  - (6) Store waste solvent only in closed containers.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

- (b) The Permittee of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
  - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
  - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
  - (3) If used, solvent spray:
    - (A) must be a solid, fluid stream; and
    - (B) shall be applied at a pressure that does not cause excessive splashing.

#### D.2.3 Material Requirements for Cold Cleaning Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8, the Permittee must comply with the following requirements with respect to the insignificant degreasing operations:

- (a) Pursuant to IAC 8-3-8(b)(2), the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Pursuant to 326 IAC 8-3-8(c)(2), the Permittee shall maintain each of the following records for each purchase of solvents for use in the insignificant Heritage cold cleaning degreaser. These records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase.
  - (3) The type of solvent.
  - (4) The volume of each unit of solvent.
  - (5) The total volume of the solvent.
  - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

## SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Hazardous waste material (HWM) tank storage, identified as Unit 1, described as follows:
- (1) HWM mix, blend, and storage tanks, identified as 1R, 4, 18, 19, 20, 21, 22, and 23, with nominal gallon capacities of 12,600, 12,690, 20,353, 20,353, 19,688, 20,353, 20,353, and 20,353, respectively, constructed in 2008, 1970, 1993, 1993, 1993, 1993, 1993, 1993, and 1993, respectively, collectively using three (3) sets of carbon adsorbers with the sets used alternately, each set with two (2) carbon canisters in series for VOC control, using a closed-loop vapor exchange system to minimize air emissions, and exhausting to one stack, identified as HWM Storage/Blending Stack.
  - (2) HWF receiving, blending and storage tank, identified as 29, with a capacity of 21,000 gallons, constructed in 2000, using one (1) carbon adsorber unit consisting of two (2) carbon canisters in series for VOC control, using a closed-loop vapor exchange system to minimize air emissions, and exhausting to stack TK 29.
  - (3) HWF blending and mixing tanks, identified as 6 and 7, with gallon capacities of 4,386 and 2,900, respectively, constructed in 1989 and 1952, respectively, collectively using a flare as primary VOC control and carbon canisters as backup VOC control.
  - (4) One (1) hydropulper tank, identified as Tank 24 HP, constructed in 1993, with a capacity of 3,500 gallons using one (1) carbon adsorber unit consisting of two (2) carbon canisters and one (1) feed hopper using a separate carbon control system.
- (b) Hazardous waste fuel (HWF), hazardous waste for tolling and organic liquid product receiving and shipping operations located at Area 2, Area 8 and the Rail line, including organic product receiving/shipping, identified as Unit 2, with a maximum capacity of 7,200 gallons of liquid material per hour, constructed in 1991, and consisting of the following operations:
- (1) Loading and unloading of railcars, occurring outdoors and unenclosed, and using submerged filling;
  - (2) Loading and unloading of tank trucks, occurring semi-enclosed in a three-sided shed, and at separate unenclosed areas, and using bottom filling; and
  - (3) Unloading of various sizes of drums and totes.
- (c) One (1) materials manual lab packing, unpacking, and bulking operation, identified as Unit 4, with a maximum capacity of 27,375 pack containers per year, constructed in 1992, including three insignificant booths located in Area 5 in addition to the following equipment:
- (1) One (1) booth for manual lab packing, unpacking and bulking of organic materials, identified as Lab Pack Booth 1, using a single carbon canister for VOC control, and exhausting to stack LP S1.
- (d) One (1) Solids Distillation System (SDS), constructed in 2004, with a maximum throughput rate of 4 tons of waste per hour, consisting of:
- (1) One (1) SDS Shredder, approved for modification in 2013, using a variable speed fan and carbon adsorption system for VOC control, exhausting to stacks SDS 01(a) and (b).
  - (2) One (1) Anaerobic Thermal Desorption System enclosed feed conveyor under nitrogen blanketing, and enclosed in a chilled jacket, using a carbon adsorption system for VOC control, exhausting to SDS 03.

- (3) One (1) Anaerobic Thermal Desorption Unit, identified as ATDU, with one (1) 10 MMBtu/hr natural gas fired heater, exhausting to stack SDS 02.
- (4) One (1) Oil-Water Separator, using a carbon adsorption system for VOC control, exhausting to stack SDS 03.
- (5) One (1) water tank, using a carbon adsorption system for VOC control, exhausting to stack SDS 08.
- (6) One (1) Vapor Recovery Unit (VRU), using an enclosed John Zink flare with a demister (and a carbon adsorption system as backup) for VOC control, exhausting to stack SDS 07.
- (7) One (1) solids shaker and conveyor system, using two (2) baghouses for particulate control, exhausting to stacks SDS 04 and SDS 09.
- (e) One (1) Distillation Unit, constructed in 2004, with a maximum throughput rate of 1.0 tons of liquid waste per hour, controlled by a carbon adsorption system, and exhausting to stack SDS 05.
- (f) One (1) condensed liquid tank, identified as Tank 55, constructed in 2004, with a nominal capacity of 20,000 gallons, used to collect oil from the oil-water separator, controlled by a carbon Adsorption system, and exhausting to stack SDS 08.
- (g) Three (3) RCRA hazardous waste tanks, identified as Tanks 52 through 54, constructed in 2004, each with a nominal capacity of 12,000 gallons, controlled by a carbon adsorption system, and exhausting to stack SDS 08.
- (h) Five (5) product tanks, identified as Tanks 57 through 61, constructed in 1998, with nominal capacities of 20,000 gallons, 20,000 gallons, 6,000 gallons, 6,000 gallons and 20,000 gallons, respectively, each controlled by a carbon adsorption system containing two (2) carbon canisters, and exhausting to stacks LDS 09a-09e.
- (i) One (1) Pot Still, constructed in 2007, with a maximum throughput rate of 70 gallons of liquid waste per hour, controlled by a carbon adsorption system, and exhausting to stack SDS 10.
- (j) One (1) Thin Film Evaporator, constructed in 2008, with a 2.4 million Btu/hr natural gas fired burner and a maximum throughput rate of 390 gallons of liquid waste per hour, controlled by a carbon adsorption system, and exhausting to stack S11.
- (k) Six (6) product tanks located in Area 1, identified as Tanks 62 through 67, permitted in 2008 with nominal capacities of 12,000 gallons per tank, controlled by a carbon adsorption system, and exhausted to stacks S12-S17, respectively. Also included is a molecular sieve, installed in 2010.
- (l) One (1) degassing operation, constructed in 2008 and approved in 2014 for modification, with a maximum degassing rate of 405.8 tons of gasses per year. The degassing operation includes a reactor tank into which gasses are vented and a pressurized "shock" tank that will condense gasses into liquids for collection and offsite shipment, with remaining gasses controlled by a flare or carbon canisters.

(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 2-7-5(1)]

### E.1.1 General Provisions relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

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The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the facilities described in this section except when otherwise specified in 40 CFR Part 63, Subpart DD.

### E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) - Offsite Waste and Recovery Operations [326 IAC 20-23] [40 CFR Part 63, Subpart DD]

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Pursuant to 40 CFR 63 Subpart DD, the Permittee shall comply with the following provisions of 40 CFR 63 Subpart DD (included as Attachment B of this permit), which are incorporated by reference in 326 IAC 20-23, for the facilities described in this section:

- (1) 40 CFR 63.680
- (2) 40 CFR 63.681
- (3) 40 CFR 63.683
- (4) 40 CFR 63.684
- (5) 40 CFR 63.685
- (6) 40 CFR 63.686
- (7) 40 CFR 63.687
- (8) 40 CFR 63.688
- (9) 40 CFR 63.689
- (10) 40 CFR 63.690
- (11) 40 CFR 63.691
- (12) 40 CFR 63.693
- (13) 40 CFR 63.694
- (14) 40 CFR 63.695
- (15) 40 CFR 63.696
- (16) 40 CFR 63.697
- (17) 40 CFR 63.698

### E.1.3 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR 61, Subpart A] [326 IAC 14-1]

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The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14-1, apply source-wide except when otherwise specified in 40 CFR 61, Subpart FF.

### E.1.4 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Benzene Waste Operations [40 CFR 61, Subpart FF]

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Pursuant to 40 CFR 61 Subpart FF, the Permittee shall comply with the following provisions of 40 CFR 61 Subpart FF (included as Attachment A of this permit) for the facilities described in this section:

- (1) 40 CFR 61.340;
- (2) 40 CFR 61.341;
- (3) 40 CFR 61.342;
- (4) 40 CFR 61.343;
- (5) 40 CFR 61.345;
- (6) 40 CFR 61.346;
- (7) 40 CFR 61.349;
- (8) 40 CFR 61.350;
- (9) 40 CFR 61.351;
- (10) 40 CFR 61.354(a), (d), (e) and (f);
- (11) 40 CFR 61.355;
- (12) 40 CFR 61.356; and
- (13) 40 CFR 61.357.

E.1.5 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants (NESHAP) [326 IAC 14-1] [40 CFR 61, Subpart A]

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The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14-1, apply to the source except when otherwise specified in 40 CFR 61, Subpart J.

E.1.6 National Emission Standards for Hazardous Air Pollutants (NESHAP) - Equipment Leaks from Fugitive Emission Sources of Benzene [326 IAC 14-7][40 CFR Part 61, Subpart J]

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Pursuant to 40 CFR 61 Subpart J, the Permittee shall comply with the following provisions of 40 CFR 61 Subpart J (included as Attachment C of this permit), which are incorporated as 326 IAC 14-7 for the facilities described in this section:

- (1) 40 CFR 61.110
- (2) 40 CFR 61.246(i)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Tradebe Treatment and Recycling LLC  
Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312  
Part 70 Permit No.: T 089-29424-00345

**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:

Phone:

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**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Tradebe Treatment and Recycling LLC  
Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312  
Part 70 Permit No.: T 089-29424-00345

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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  
PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Tradebe Treatment and Recycling LLC  
Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312  
Part 70 Permit No.: T 089-29424-00345

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**Technical Support Document (TSD) for a Part 70  
Minor Source Modification and Minor Permit Modification**

**Source Description and Location**

Source Name:	Tradebe Treatment and Recycling, LLC
Source Location:	4343 Kennedy Avenue, East Chicago, IN 46312
County:	Lake
SIC Code:	4953 (Refuse Systems)
Operation Permit No.:	T 089-29424-00345
Operation Permit Issuance Date:	February 25, 2011
Minor Source Modification No.:	089-34241-00345
Minor Permit Modification No.:	089-34282-00345
Permit Reviewer:	Heath Hartley

**Existing Approvals**

The source was issued Part 70 Operating Permit No. T 089-29424-00345 on February 25, 2011. The source has since received the following approvals:

- (a) Administrative Amendment No. 089-32233-00345, issued on August 29, 2012; and
- (b) Administrative Amendment No. 089-33257-00345, issued on June 20, 2013.

**County Attainment Status**

The source is located in Lake County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O <sub>3</sub>	40 CFR 81.315 as amended by 77 FR 34228. <sup>1,2</sup>
PM <sub>2.5</sub>	Attainment effective February 6, 2012, for the annual PM2.5 standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM2.5 standard.
PM <sub>10</sub>	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

<sup>1</sup>Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005.

<sup>2</sup>The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228.

- (a) **Ozone Standards**  
 U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake as nonattainment for ozone. On August 1, 2012, the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against U.S. EPA in the U.S. Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO<sub>x</sub> emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (b) **PM<sub>2.5</sub>**  
 Lake County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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

**Source Status**

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

<b>Pollutant</b>	<b>Emissions (ton/yr)</b>
PM	80.4
PM <sub>10</sub>	79.2
PM <sub>2.5</sub>	79.2
SO <sub>2</sub>	0.0
NO <sub>x</sub>	6.5
VOC	53.9
CO	5.5
GHGs as CO <sub>2</sub> e	7,878
<b>Total HAPs</b>	<b>68.7</b>

Note: Potential to emit calculations for existing units have been updated since previous permit approvals. These changes include the correction of calculations for the SDS Shaker and Conveyor, Unit 2, Lab Pack and the inclusion of calculations for the tanks (24, 55, and 62 through 67) and degassing operation.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

- (b) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year. GHG emissions do not affect the source PSD status.
- (c) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (d) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (e) These emissions are based upon Part 70 Operating Permit No. T 089-29424-00345, Administrative Amendment No. 089-32233-00345 and Administrative Amendment No. 089-33257-00345.

#### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Tradebe Treatment and Recycling, LLC on February 27, 2014, relating to the addition of a flare for VOC control of the degassing operation, Tank 6 and Tank 7. The degassing operations will increase throughput. The following is a list of the modified emission units and proposed pollution control devices:

- (a) One (1) materials manual lab packing, depacking, **and bulking and degassing operation**, identified as Unit 4, with a maximum capacity of 27,375 pack containers per year, constructed in 1992, including three insignificant booths ~~and one insignificant degassing operation~~ located in are 5 in addition to the following equipment:
- (b) **One (1) degassing operation, constructed in 2008 and approved in 2014 for modification, with a maximum degassing rate of 405.8 tons of gasses per year. The degassing operation includes a reactor tank into which gasses are vented and a pressurized “shock” tank that will condense gasses into liquids for collection and offsite shipment, with remaining gasses controlled by a flare or carbon canisters.**
- (c) HWF blending and mixing tanks, identified as 6 and 7, with gallon capacities of 4,386 and 2,900, respectively, constructed in 1989 and 1952, respectively, collectively using ~~one (1) carbon adsorber unit consisting of two (2) carbon canisters used alternately for a flare as primary VOC control and carbon canisters as backup VOC control, using a nitrogen blanketing closed loop vapor exchange system and an air-cooled heat exchanger (chiller) to minimize air emissions, and exhausting to stack TK 6-7.~~

#### Enforcement Issues

There are no pending enforcement actions related to this modification.

#### Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

#### Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

<b>PTE Change of the Modified Process</b>			
<b>Pollutant</b>	<b>Uncontrolled PTE of Degassing Operation Before Modification (ton/yr)</b>	<b>Uncontrolled PTE of Degassing Operation After Modification (ton/yr)</b>	<b>Increase from Modification (ton/yr)</b>
PM	0	0	0
PM <sub>10</sub>	0	0	0
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	0	0	0
NO <sub>x</sub>	0	0	0
VOC	4.0	17.0	13.0
CO	0	0	0
HAPs	0.06	0.28	0.22

This source modification is subject to 326 IAC 2-7-10.5(e)(1)(B) because the potential to emit VOC is greater than ten (10) tons per year and less than twenty-five (25) tons per year before control.

Additionally, the modification will be incorporated into the Part 70 Operating Permit through a minor permit modification issued pursuant to 326 IAC 2-7-12(b), because it does not require a case-by-case determination of an emission limitation or changes in monitoring, recordkeeping, or reporting.

<b>Permit Level Determination – PSD and Emission Offset</b>
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The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing units and limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Potential to Emit of the Entire Source After Issuance of Modification (ton/yr)									
Process / Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs
HWF Storage	0	0	0	0	0	8.9	0	0	8.9
HWF Ship**	0	0	0	0	0	<del>48.0</del> 32.4	0	0	32.4
<b>Unit 24**</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2.2</b>	<b>0</b>	<b>0</b>	<b>2.2</b>
Lab Pack**	0.6	0.6	0.6	0	0	<del>1.4</del> 2.5	0	0	<del>1.4</del> 2.5
<b>Degassing</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<del>4.0</del> 17.0	<b>0</b>	<b>0</b>	<del>0</del> 0.3
SDS Shredder	0	0	0	0	0	<del>2.6</del> 0.12***	0	0	2.6
SDS Shaker and conveyor**	<del>5.6</del> 77.7	<del>5.6</del> 77.7	<del>5.6</del> 77.7	0	0	14.8 0.7***	0	0	0
SDS-ATDU	0	0	0	0	0		0	0	14.8
SDS-ATDU from NG	0.1	0.3	0.3	0	4.4		3.7	5,287	0.1
Distillation	0	0	0	0	0	<del>2.3</del> 0.06***	0	0	2.3
Tank 52-6167**	0	0	0	0	0	<del>2.0</del> 2.4	0	0	2.4
Pot Still**	0	0	0	0	0	0.5	0	0	<del>0</del> 0.5
Thin Film Evap	0	0	0	0	1.1	0.1	0.9	1,269	<del>0</del> 0.02
Heater	0.0	0.1	0.1	0	1.1	0	0.9	1,322	<del>0</del> 0.02
Fugitive	1.9	0.4	0.4	0	0	0	0	0	0
Total PTE of Entire Source	<del>7</del> 80.4	<del>7</del> 79.2	<del>7</del> 79.2	0	6.5	<del>50</del> 66.8	5.5	7,878	<del>50</del> 68.9
PSD Major Source Thresholds	250	250	250	250	NA	NA	250	--	25
Subject to Regulation	NA	NA	NA	NA	NA	NA	NA	100,000 CO <sub>2</sub> e	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	100	100	NA	NA	NA

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 \*\*Existing units; calculations were corrected and/or emissions are now included.  
 \*\*\*This unit is limited by 326 IAC 2-3 (Emission Offset).

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source/permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text unbolded and strikethrough text deleted)

Potential to Emit of the Entire Source After Issuance of Modification (ton/yr)									
Process / Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs
HWF Storage	0	0	0	0	0	8.9	0	0	8.9
HWF Ship**	0	0	0	0	0	32.4	0	0	32.4
Unit 24**	0	0	0	0	0	2.2	0	0	2.2
Lab Pack**	0.6	0.6	0.6	0	0	2.5	0	0	2.5
Degassing	0	0	0	0	0	17.0	0	0	0.3
SDS Shredder	0	0	0	0	0	0.12***	0	0	2.6
SDS Shaker and conveyor**	77.7	77.7	77.7	0	0	0.7***	0	0	0
SDS-ATDU	0	0	0	0	0		0	0	14.8
SDS-ATDU from NG	0.1	0.3	0.3	0	4.4		3.7	5,287	0.1
Distillation	0	0	0	0	0	0.06***	0	0	2.3
Tank 52-67**	0	0	0	0	0	2.4	0	0	2.4
Pot Still**	0	0	0	0	0	0.5	0	0	0.5
Thin Film Evap	0	0	0	0	1.1	0.1	0.9	1,269	0.02
Heater	0.0	0.1	0.1	0	1.1	0	0.9	1,322	0.02
Fugitive	1.9	0.4	0.4	0	0	0	0	0	0
<b>Total PTE of Entire Source</b>	<b>80.4</b>	<b>79.2</b>	<b>79.2</b>	<b>0</b>	<b>6.5</b>	<b>66.8</b>	<b>5.5</b>	<b>7,878</b>	<b>68.9</b>
PSD Major Source Thresholds	250	250	250	250	NA	NA	250	--	25
Subject to Regulation	NA	NA	NA	NA	NA	NA	NA	100,000 CO <sub>2</sub> e	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	100	100	NA	NA	NA

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 \*\*Existing units; calculations were corrected and/or emissions are now included.  
 \*\*\*This unit is limited by 326 IAC 2-3 (Emission Offset).

- (a) This modification to an existing minor PSD stationary source is not major because:
- (a) The emissions increase of each PSD regulated pollutant, excluding GHGs, are less than the PSD major source thresholds; and
  - (b) The emissions increase of GHGs from this modification to an existing minor PSD source are less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year.

Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

- (b) This modification to an existing minor stationary source is not major because, after the emissions increase, the source will still have potential emissions less than the Emission Offset major source thresholds. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

**Federal Rule Applicability Determination**

The following federal rules are applicable to the source due to this modification:

**NSPS:**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

**NESHAP:**

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Degassing	Flare	N	17.0	0.3	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the modified unit as part of this modification.

**State Rule Applicability Determination**

The following state rules are applicable to the source due to the modification:

**326 IAC 2-2 and 2-3 (PSD and Emission Offset)**

PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The degassing operation will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-6 (Emission Reporting)**

Since this source is located in Lake County, and has a potential to emit VOC greater than or equal to twenty-five (25) tons per year, an emission statement covering the previous calendar year must be

submitted by July 1 of each year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

**326 IAC 8-1-6 (Volatile Organic Compounds - BACT)**

The degassing operation has potential VOC emissions of less than 25 tons per year. Therefore, the degassing operation is not subject to the requirements of 326 IAC 8-1-6.

**326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)**

The degassing operation, located in Lake County, has potential VOC emissions of less than 25 tons per year. Therefore, the degassing operation is not subject to the requirements of 326 IAC 8-7.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

There are no compliance determination or compliance monitoring requirements as part of this modification.

**Proposed Changes**

The changes listed below have been made to Part 70 Operating Permit No. T089-29424-00345. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

**Change 1:** A flare is added to control VOC of the degassing operations and Tanks 6 & 7. Other descriptive changes are being made.

A.2 Emission Units and Pollution Control Equipment Summary  
[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Hazardous waste material (HWM) tank storage, identified as Unit 1, described as follows:
  - (1) HWM mix, blend, and storage tanks, identified as 1R, 4, 18, 19, 20, 21, 22, and 23, with nominal gallon capacities of 12,600, 12,690, 20,353, 20,353, 19,688, 20,353, 20,353, and 20,353, respectively, constructed in 2008, 1970, 1993, 1993, 1993, 1993, and 1993, respectively, collectively using three (3) sets of carbon adsorbers with the sets used alternately, each set with two (2) carbon canisters in series for VOC control, using a ~~nitrogen blanketing~~ closed-loop vapor exchange system to minimize air emissions, and exhausting to one stack, identified as HWM Storage/Blending Stack.
  - (2) HWF receiving, blending and storage tank, identified as 29, with a capacity of 21,000 gallons, constructed in 2000, using one (1) carbon adsorber unit consisting of two (2) carbon canisters in series for VOC control, using a ~~nitrogen~~

~~blanketing~~ closed-loop vapor exchange system to minimize air emissions, and exhausting to stack TK 29.

- (3) HWF blending and mixing tanks, identified as 6 and 7, with gallon capacities of 4,386 and 2,900, respectively, constructed in 1989 and 1952, respectively, collectively using ~~one (1) carbon adsorber unit consisting of two (2) carbon canisters used alternately for a flare as primary VOC control and carbon canisters as backup VOC control,~~ using a nitrogen blanketing closed loop vapor exchange system and an air-cooled heat exchanger (chiller) to minimize air emissions, and exhausting to stack TK 6-7.

.....

- (b) Hazardous waste fuel (HWF), **hazardous waste for tolling and organic liquid product receiving and shipping operations located at Area 2, Area 8 and the Rail line, including organic product receiving/shipping**, identified as Unit 2, with a maximum capacity of 7,200 gallons of **HWF liquid material** per hour, constructed in 1991, ~~using no controls,~~ and consisting of the following operations:

- (1) Loading and unloading of railcars, occurring outdoors and unenclosed, and using submerged filling;
- (2) Loading and unloading of tank trucks, occurring semi-enclosed in a three-sided shed **and at separate unenclosed areas**, and using bottom filling; and
- (3) Unloading of various sizes of drums and totes.

- (c) One (1) materials manual lab packing, depacking, **and bulking and degassing** operation, identified as Unit 4, with a maximum capacity of 27,375 pack containers per year, constructed in 1992, including three insignificant booths ~~and one insignificant degassing operation~~ located in Area 5 in addition to the following equipment:

.....

- (l) **One (1) degassing operation, constructed in 2008 and approved in 2014 for modification, with a maximum degassing rate of 405.8 tons of gasses per year. The degassing operation includes a reactor tank into which gasses are vented and a pressurized "shock" tank that will condense gasses into liquids for collection and offsite shipment, with remaining gasses controlled by a flare or carbon canisters.**

.....

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

- (a) Hazardous waste material (HWM) tank storage, identified as Unit 1, described as follows:
- (1) HWM mix, blend, and storage tanks, identified as 1R, 4, 18, 19, 20, 21, 22, and 23, with nominal gallon capacities of 12,600, 12,690, 20,353, 20,353, 19,688, 20,353, 20,353, and 20,353, respectively, constructed in 2008, 1970, 1993, 1993, 1993, 1993, 1993, and 1993, respectively, collectively using three (3) sets of carbon adsorbers with the sets used alternately, each set with two (2) carbon canisters in series for VOC control, using a ~~nitrogen blanketing~~ closed-loop vapor exchange system to minimize air emissions, and exhausting to one stack, identified as HWM Storage/Blending Stack.
- (2) HWF receiving, blending and storage tank, identified as 29, with a capacity of 21,000 gallons, constructed in 2000, using one (1) carbon adsorber unit consisting of two (2) carbon canisters in series for VOC control, using a ~~nitrogen blanketing~~ closed-loop vapor exchange system to minimize air emissions, and exhausting to stack TK 29.

- (3) HWF blending and mixing tanks, identified as 6 and 7, with gallon capacities of 4,386 and 2,900, respectively, constructed in 1989 and 1952, respectively, collectively using one (1) carbon adsorber unit consisting of two (2) carbon canisters used alternately for **a flare as primary VOC control and carbon canisters as backup VOC control**, using a ~~nitrogen blanketing closed-loop vapor exchange system and an air-cooled heat exchanger (chiller) to minimize air emissions, and exhausting to stack TK 6-77.~~
  - (4) One (1) hydropulper tank, identified as Tank 24 HP, constructed in 1993, with a capacity of 3,500 gallons using one (1) carbon adsorber unit consisting of two (2) carbon canisters, and one (1) feed hopper using a separate carbon control system.
- (b) Hazardous waste fuel (HWF), **hazardous waste for tolling and organic liquid product receiving and shipping operations located at Area 2, Area 8 and the Rail line, including organic product receiving/shipping**, identified as Unit 2, with a maximum capacity of 7,200 gallons of ~~HWF liquid material~~ per hour, constructed in 1991, ~~using no controls~~, and consisting of the following operations:
- (1) Loading and unloading of railcars, occurring outdoors and unenclosed, and using submerged filling;
  - (2) Loading and unloading of tank trucks, occurring semi-enclosed in a three-sided shed **and at separate unenclosed areas**, and using bottom filling; and
  - (3) Unloading of various sizes of drums and totes.
- (c) One (1) materials manual lab packing, ~~unpacking, and bulking and degassing~~ operation, identified as Unit 4, with a maximum capacity of 27,375 pack containers per year, constructed in 1992, including three insignificant booths ~~and one insignificant degassing operation~~ located in Area 5 in addition to the following equipment:  
.....
- (I) **One (1) degassing operation, constructed in 2008 and approved in 2014 for modification, with a maximum degassing rate of 405.8 tons of gasses per year. The degassing operation includes a reactor tank into which gasses are vented and a pressurized "shock" tank that will condense gasses into liquids for collection and offsite shipment, with remaining gasses controlled by a flare or carbon canisters.**
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

.....

#### SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

- Emissions Unit Description:
- (a) Hazardous waste material (HWM) tank storage, identified as Unit 1, described as follows:
    - (1) HWM mix, blend, and storage tanks, identified as 1R, 4, 18, 19, 20, 21, 22, and 23, with nominal gallon capacities of 12,600, 12,690, 20,353, 20,353, 19,688, 20,353, 20,353, and 20,353, respectively, constructed in 2008, 1970, 1993, 1993, 1993, 1993, 1993, and 1993, respectively, collectively using three (3) sets of carbon adsorbers with the sets used alternately, each set with two (2) carbon canisters in series for VOC control, using a ~~nitrogen blanketing~~ closed-loop vapor exchange system to minimize air emissions, and exhausting to one stack, identified as HWM Storage/Blending Stack.
    - (2) HWF receiving, blending and storage tank, identified as 29, with a capacity of 21,000 gallons, constructed in 2000, using one (1) carbon adsorber unit consisting of two (2) carbon canisters in series for VOC control, using a ~~nitrogen blanketing~~ closed-loop vapor exchange system to minimize air emissions, and exhausting to stack TK 29.

- (3) HWF blending and mixing tanks, identified as 6 and 7, with gallon capacities of 4,386 and 2,900, respectively, constructed in 1989 and 1952, respectively, collectively using ~~one (1) carbon adsorber unit consisting of two (2) carbon canisters used alternately for~~ **a flare as primary VOC control and carbon canisters as backup VOC control**, ~~using a nitrogen blanketing closedloop vapor exchange system and an air-cooled heat exchanger (chiller) to minimize air emissions, and exhausting to stack TK 6-77.~~
- (4) One (1) hydropulper tank, identified as Tank 24 HP, constructed in 1993, with a capacity of 3,500 gallons using one (1) carbon adsorber unit consisting of two (2) carbon canisters, and one (1) feed hopper using a separate carbon control system.
- (b) Hazardous waste fuel (HWF), **hazardous waste for tolling and organic liquid product receiving and shipping operations located at Area 2, Area 8 and the Rail line, including organic product receiving/shipping**, identified as Unit 2, with a maximum capacity of 7,200 gallons of ~~HWF liquid material~~ per hour, constructed in 1991, ~~using no controls~~, and consisting of the following operations:
- (1) Loading and unloading of railcars, occurring outdoors and unenclosed, and using submerged filling;
- (2) Loading and unloading of tank trucks, occurring semi-enclosed in a three-sided shed **and at separate unenclosed areas**, and using bottom filling; and
- (3) Unloading of various sizes of drums and totes.
- (c) One (1) materials manual lab packing, unpacking, **and bulking and degassing** operation, identified as Unit 4, with a maximum capacity of 27,375 pack containers per year, constructed in 1992, including three insignificant booths ~~and one insignificant degassing operation~~ located in Area 5 in addition to the following equipment:  
.....
- (l) **One (1) degassing operation, constructed in 2008 and approved in 2014 for modification, with a maximum degassing rate of 405.8 tons of gasses per year. The degassing operation includes a reactor tank into which gasses are vented and a pressurized "shock" tank that will condense gasses into liquids for collection and offsite shipment, with remaining gasses controlled by a flare or carbon canisters.**
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

#### Other Changes

The changes listed below have been made to Part 70 Operating Permit No. T 089-29424-00345. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

**Change 1:** On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The change is only to site of these rules in Section A - General Information and Section C - Risk Management Plan.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(4514)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary waste management, recycling and fuel processing source.

.....

C.12 Risk Management Plan [326 IAC 2-7-5(1142)] [40 CFR 68]

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.....

**Change 2:** IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

.....

**Change 3:** IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, **where applicable:**
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the Part 70 permit.
- Records of required monitoring information include the following, **where applicable:**
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

.....

**Change 4:** IDEM is changing the Section C Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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- (a) **For new units:**  
**Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.**
- (b) **For existing units:**  
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

.....

**Change 5:** IDEM, OAQ has decided to clarify the following conditions:

**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]**

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A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and their control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

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**D.1.6 Emissions Controls [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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In order to ~~comply~~ **ensure compliance** with Condition D.1.2:

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**D.1.7 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

.....

(e) ~~The Permittee shall perform troubleshooting contingency and response steps when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~ **If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.**

**D.1.8 Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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(a) The Permittee shall monitor the ~~total~~ pressure drop across the baghouses used in conjunction with the shaker and conveyor system section of the Solids Distillation System, at least once per day when the shaker and/or conveyor system is in operation. ~~When for any one reading, the pressure drop across the baghouses is outside the normal range of 2.0 and 14.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.~~ **When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 2.0 and 14.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.** A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated **or replaced** at least once every six (6) months.

.....

#### D.1.10 Record Keeping Requirements

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- (a) To document **the** compliance **status** with Condition D.1.3 - Volatile Organic Compounds, the Permittee shall maintain the records specified in that condition.
- (b) To document **the** compliance **status** with Condition D.1.7 - Visible Emissions Notations, the Permittee shall maintain once per day records of the visible emission notations. The Permittee shall include in its daily record when any of these records are not taken and the reason (e.g., the process did not operate that day).
- (c) To document **the** compliance **status** with Condition D.1.8 - Parametric Monitoring, the Permittee shall maintain once per day records of the baghouse pressure drop readings. The Permittee shall include in its daily record when any of these records are not taken and the reason (e.g., the process did not operate that day).

.....

**Change 6:** IDEM is updating Section E.1 to provide clarification, to identify the associated attachment for each federal rule, and to correct typographical errors.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

##### E.1.1 General Provisions relating to NESHAP [326 IAC 20-~~123~~][40 CFR Part 63, Subpart **ADD**]

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The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-~~123~~, apply to the facilities described in this section except when otherwise specified in 40 CFR Part 63, Subpart DD.

##### E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) - Offsite Waste and Recovery Operations [326 IAC 20-23] [40 CFR Part 63, Subpart DD]

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Pursuant to 40 CFR 63 Subpart DD, the Permittee shall comply with the **following** provisions of 40 CFR 63 Subpart DD (**included as Attachment B of this permit**), which are incorporated by reference in 326 IAC ~~20-23~~**14-4**, for the facilities described in this section-~~as follows~~:

.....

##### E.1.3 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR 61, Subpart A] [326 IAC 14-1-4]

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The provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14-1-4, apply source-wide except when otherwise specified in 40 CFR 61, Subpart FF-~~(Attachment A)~~.

##### E.1.4 National Emission Standards for Hazardous Air Pollutants (NESHAP) **for Benzene Waste Operations** [40 CFR 61, Subpart FF]-~~[326 IAC 14]~~

---

Pursuant to 40 CFR 61 Subpart FF, the Permittee shall comply with the **following** provisions of 40 CFR 61 Subpart FF (**included as Attachment A of this permit**), ~~which are incorporated as 326 IAC 14-1 for the source-wide, as specified as follows~~ **for the facilities described in this section:**

.....

##### E.1.5 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants (NESHAP) [326 IAC 14-~~71~~] [40 CFR ~~63~~**61**, Subpart A]

---

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14-~~71~~, apply to the source except when otherwise specified in 40 CFR 61, Subpart J.

E.1.6 National Emission Standards for Hazardous Air Pollutants (NESHAP) - Equipment Leaks from Fugitive Emission Sources of Benzene [326 IAC 14-7][40 CFR Part 61, Subpart J]

Pursuant to 40 CFR 61 Subpart J, the Permittee shall comply with the **following** provisions of 40 CFR 61 Subpart J (**included as Attachment C of this permit**), which are incorporated as 326 IAC 14-7 for the source, as specified as follows for the facilities described in this section:

.....

**Change 7:** The existing emission offset avoidance limit (D.1.1(b)) has been clarified as follows:

D.1.1 Emission Offset [326 IAC 2-3][326 IAC 8-1-6]

.....

- (b) Pursuant to MSM 089-15970-00345, issued December 2, 2003, and MPM 089-18513-00345, issued February 4, 2004, and as revised by this Part 70 permit, the VOC emissions from the SDS shredder, Solids Distillation System and Distillation Unit shall not exceed the emission limits listed in the table below:

Unit ID	Stack(s) ID	VOC Emission Limit (lb/hr)
SDS Shredder	SDS 01(a) and (b).	0.028, <b>total</b>
Solids Distillation System*	SDS 02, SDS 03, SDS 04, SDS 07, SDS 08, and SDS 09	0.169, <b>total</b>
Distillation Unit	SDS 05	0.014

.....

**Change 7:** The existing shaker and conveyor system of the Solids Distillation System is subject to the requirements of 326 IAC 6.8 (Particulate Emission Limitations for Lake County) instead of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), since the source is located in Lake County and it has a potential to emit particulate matter greater than 10 tons per year. This is a Title I change.

D.1.2 Particulate Emission Limitations for ~~Manufacturing Processes~~ **Lake County** [326 IAC ~~6-3-26.8-1~~]

Pursuant to 326 IAC ~~6-3-26.8-1-2~~, the allowable particulate emission rate **particulate matter** from the shaker and conveyor system section of the Solids Distillation System (exhausting to stacks SDS 04 and SDS 09) shall not exceed ~~10.4 pounds per hour~~ **0.03 grain per dry standard cubic foot** when operating at a process weight rate of 4 tons per hour.

The pounds per hour limitation were calculated with the following equation:

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

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

.....

D.2.1 Particulate Emission Limitations **for Lake County** [326 IAC ~~6-3-26.8-1~~]

Pursuant to 326 IAC ~~6-3-2(e) 6.8-1-2~~, the particulate emissions **particulate matter** from LP B4 of Unit 4, Lab Pack Booth 2 and Booth 3 shall not exceed ~~0.551 pounds per hour~~ **0.03 grain per dry standard cubic foot**, each.

### Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 089-34241-00345 and Minor Permit Modification No. 089-34282-00345. The staff recommend to the Commissioner that this Part 70 Minor Source Modification and Minor Permit Modification be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Heath Hartley at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8217 or toll free at 1-800-451-6027 extension 2-8217.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Emissions Summary Sheet**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**Before Modification**

Uncontrolled PTE (TPY)										
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2e</sub>	Single HAP	Total HAPs
HWM Storage	0	0	0	0	0	8.9	0	0	0	8.87
HWF Ship	0	0	0	0	0	32.4	0	0	0	32.36
Unit 24	0	0	0	0	0	2.2	0	0	0	2.21
Lab Pack	0.6	0.6	0.6	0	0	2.5	0	0	0	2.48
Degassing	0	0	0	0	0	4.0	0	0	0	0.06
SDS Shredder	0	0	0	0	0	2.6	0	0	0	2.63
SDS Shaker and conveyor	77.7	77.7	77.7	0	0	0	0	0	0	0
SDS-ATDU	0	0	0	0	0	14.8	0	0	0	14.78
SDS-ATDU from NG	0.1	0.3	0.3	0.0	4.4	0.2	3.7	5,287	0.08	0.08
Distillation	0	0	0	0	0	2.3	0	0	0	2.28
Tank 52-61	0	0	0	0	0	2.4	0	0	0	2.42
Pot Still	0	0	0	0	0	0.5	0	0	0	0.48
Thin Film Evap	0.0	0.1	0.1	0.0	1.1	0.1	0.9	1,269	0.02	0.02
Heater	0.0	0.1	0.1	0.0	1.1	0.1	0.9	1,322	0.02	0.02
Fugitive	1.9	0.4	0.4	0	0	0	0	0	0	0
<b>Total</b>	<b>80.4</b>	<b>79.2</b>	<b>79.2</b>	<b>0.0</b>	<b>6.5</b>	<b>72.9</b>	<b>5.5</b>	<b>7,878</b>	<b>0.1</b>	<b>68.7</b>

Limited PTE (TPY)										
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2e</sub>	Single HAP	Total HAPs
HWF Storage	0	0	0	0	0	8.9	0	0	0	8.87
HWF Ship	0	0	0	0	0	32.4	0	0	0	32.36
Unit 24	0	0	0	0	0	2.2	0	0	0	2.21
Lab Pack	0.6	0.6	0.6	0	0	2.5	0	0	0	2.48
Degassing	0	0	0	0	0	4.0	0	0	0	0.06
SDS Shredder	0	0	0	0	0	0.12	0	0	0	2.63
SDS Shaker and conveyor	77.7	77.7	77.7	0	0	0.7	0	0	0	0
SDS-ATDU	0	0	0	0	0		0	0	0	14.78
SDS-ATDU from NG	0.1	0.3	0.3	0	4.4		3.7	5,287	0.1	0.08
Distillation	0	0	0	0	0	0.06	0	0	0	2.28
Tank 52-61	0	0	0	0	0	2.4	0	0	0	2.42
Pot Still	0	0	0	0	0	0.5	0	0	0	0.48
Thin Film Evap	0.0	0.1	0	0	1.1	0.1	0.9	1,269	0.0	0.02
Heater	0.0	0.1	0.1	0	1.1	0.1	0.9	1,322	0.0	0.02
Fugitive	1.9	0.4	0.4	0	0	0	0	0	0	0
<b>Total</b>	<b>80.4</b>	<b>79.2</b>	<b>79.2</b>	<b>0.0</b>	<b>6.5</b>	<b>53.9</b>	<b>5.5</b>	<b>7,878</b>	<b>0.1</b>	<b>68.7</b>

Note: Potential to Emit calculations for existing units have been updated since previous permit approvals.

**Appendix A: Emissions Calculations  
Emissions Summary Sheet**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**After Modification**

Uncontrolled PTE (TPY)										
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2e</sub>	Single HAP	Total HAPs
HWM Storage	0	0	0	0	0	8.9	0	0	0	8.87
HWF Ship	0	0	0	0	0	32.4	0	0	0	32.36
Unit 24	0	0	0	0	0	2.2	0	0	0	2.21
Lab Pack	0.6	0.6	0.6	0	0	2.5	0	0	0	2.48
Degassing	0	0	0	0	0	17.0	0	0	0	0.28
SDS Shredder	0	0	0	0	0	2.6	0	0	0	2.63
SDS Shaker and conveyor	77.7	77.7	77.7	0	0	0.0	0	0	0	0
SDS-ATDU	0	0	0	0	0	14.8	0	0	0	14.78
SDS-ATDU from NG	0.1	0.3	0.3	0.0	4.4	0.2	3.7	5,287	0.08	0.08
Distillation	0	0	0	0	0	2.3	0	0	0	2.28
Tank 52-67	0	0	0	0	0	2.4	0	0	0	2.42
Pot Still	0	0	0	0	0	0.5	0	0	0	0.48
Thin Film Evap	0.0	0.1	0.1	0.0	1.1	0.1	0.9	1,269	0.02	0.02
Heater	0.0	0.1	0.1	0.0	1.1	0.1	0.9	1,322	0.02	0.02
Fugitive	1.9	0.4	0.4	0	0	0	0	0	0	0
<b>Total</b>	<b>80.4</b>	<b>79.2</b>	<b>79.2</b>	<b>0.0</b>	<b>6.5</b>	<b>85.8</b>	<b>5.5</b>	<b>7,878</b>	<b>0.1</b>	<b>68.9</b>

Limited PTE (TPY)										
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2e</sub>	Single HAP	Total HAPs
HWM Storage	0	0	0	0	0	8.9	0	0	0	8.87
HWF Ship	0	0	0	0	0	32.4	0	0	0	32.36
Unit 24	0	0	0	0	0	2.2	0	0	0	2.21
Lab Pack	0.6	0.6	0.6	0	0	2.5	0	0	0	2.48
Degassing	0	0	0	0	0	17.0	0	0	0	0.28
SDS Shredder	0	0	0	0	0	0.12	0	0	0	2.63
SDS Shaker and conveyor	77.7	77.7	77.7	0	0	0.7	0	0	0	0
SDS-ATDU	0	0	0	0	0		0	0	0	14.78
SDS-ATDU from NG	0.1	0.3	0.3	0	4.4		3.7	5,287	0.1	0.08
Distillation	0	0	0	0	0	0.06	0	0	0	2.28
Tank 52-67	0	0	0	0	0	2.4	0	0	0	2.42
Pot Still	0	0	0	0	0	0.5	0	0	0	0.48
Thin Film Evap	0	0	0	0	1.1	0.1	0.9	1,269	0.0	0.02
Heater	0.0	0.1	0.1	0	1.1	0.1	0.9	1,322	0.0	0.02
Fugitive	1.9	0.4	0.4	0	0	0	0	0	0	0
<b>Total</b>	<b>80.4</b>	<b>79.2</b>	<b>79.2</b>	<b>0.0</b>	<b>6.5</b>	<b>66.8</b>	<b>5.5</b>	<b>7,878</b>	<b>0.1</b>	<b>68.9</b>

**Appendix A: Emissions Calculations  
VOC and HAP  
From HWF Tank Storage (Unit 1)**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

Tank #	Capacity (gal)	Actual Throughput (gpy)	Max Throughput (gpy)	Unscaled			Scaled (up to 52 wk/yr)		
				Uncontrolled VOC Emissions, lb/yr (TANKS 4.0)	Uncontrolled VOC Emissions, ton/yr	Controlled VOC Emissions, ton/yr	Uncontrolled VOC Emissions, lb/yr (TANKS 4.0)	Uncontrolled VOC/HAP Emissions, ton/yr	Controlled VOC/HAP Emissions, ton/yr
29 <sup>a</sup>	20,057	501,425	1,002,850	1,933	0.97	0.010	2,010	1.01	0.010
1R	12,690		1,625,000	1,432	0.72	0.007	1,432	0.72	0.007
4	12,690		1,625,000	1,432	0.72	0.007	1,432	0.72	0.007
18	20,353		1,625,000	2,027	1.01	0.010	2,027	1.01	0.010
19	20,353		1,625,000	2,027	1.01	0.010	2,027	1.01	0.010
20	20,353		1,625,000	2,027	1.01	0.010	2,027	1.01	0.010
21	20,353		1,625,000	2,027	1.01	0.010	2,027	1.01	0.010
22	20,353		1,625,000	2,027	1.01	0.010	2,027	1.01	0.010
23	20,353		1,625,000	2,027	1.01	0.010	2,027	1.01	0.010
6	4,386		228,072	424	0.21	0.002	424	0.21	0.002
7	2,900		150,800	275	0.14	0.001	275	0.14	0.001
<b>TOTAL ALL TANKS</b>				17,658	8.83	0.088	17,735	<b>8.87</b>	<b>0.089</b>

<sup>a</sup>source assumed one turnover per week, 50 weeks per year. Emissions from this tank are scaled up to 52 weeks per year.

Note: Above calculations are from permit number T 089-29424-00345, issued on February 25, 2011.

**Appendix A: Emissions Calculations  
VOC and HAP  
From HWF Shipping and Receiving (Unit 2)**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

Submerged filling of rail cars.

VOC emissions are estimated using following equation, from Section 5.2 of AP-42:

$$L_L = 12.46 * (S * P * M) / T$$

LL = Loading loss per 1,000 gal liquid loaded	Used these values:
S = saturation factor (from Table 5.2-1 of AP-42)	S 0.6
P = true vapor pressure of liquid load (psia)	P 0.97
M = molecular weight of vapors (lb/lb-mole)	M 75
T = temperature of bulk liquid loaded (deg. R)	T 530

	L <sub>L</sub> =	1.03	lb VOC/1,000 gal
Max throughput =	7,200	gal/hr	
Max throughput =	63,072,000	gal/yr	

**Potential VOC/HAP = 32.4 TPY**

**Appendix A: Emissions Calculations  
VOC and HAP**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

Tank 24 (SF Unit)					<b>(max production)</b>	
Tank HP24 Hydrolpulperis operated on a batch process. The tank is filled, and then pumped into other tanks in Area 2.					2,310	gallons (working)
					6	hrs (to fill)
					385	gals/hr
<b>max production (worst case emissions) annual</b>						
					385	gals/hr
					8401	# Hrs /Yr (SERVICE FACTOR)
					3,234,323	gals/yr
<b>Dimensions</b>						
	diameter	sidewall	dome	bottom		
	9	6	1.5	1.5		
volume	3,010					
volume working	2,310					
<b>HP24 Throughput (in gallons)</b>						
	<b>hourly</b>	<b>annual</b>				
<b>PTE</b>	<b>385</b>	<b>3,234,323</b>				
HP 24 filled	6	hours				
contents transferred	0.33	hours				
service factor calculation						
	7.67 hrs process, .33 hrs transfer from HP 24 to Area					
	7.67 / 8 = 95.9 % operation					
	8760	x	95.90%	=	8401 hours of operation / year	
check service factor	385	8760	95.90%	3,234,323	gals /yr	
<b>Production based "ACTUAL" numbers</b>						
<b>2013 11 months</b>	<b>lbs/gal</b>	<b>gallons</b>	<b>/</b>	<b>11</b>	<b>gals/mth</b>	<b>gals/ yr ca</b>
<b>8,367,368</b>	<b>8.34</b>	<b>1,003,282</b>	<b>/</b>	<b>11</b>	<b>91,207</b>	<b>x 12 = 1,094,489</b>
	<b>gals</b>	<b>time to empty</b>	<b>=</b>	<b>gals/min</b>	<b>hrs /yr</b>	<b>gals/hr</b>
	2310	/ 20	=	115.5	2944	372

Potential Emissions

2310 gallons per filling event  
 3,234,323 max gallons per year  
 1400 max filling events per year

Compute emissions using liquid loading loss equation from AP-42 Section 5.2

LL = 12.46 (S\*P\*M)/T

where:

LL = Liquid loading uncontrolled emission factor in lb/1000 gallons

S = Saturation Factor (use worst case factor of 1.45)

P = true vapor pressure (use worst case factor for toluene of 0.435 @ 70 deg F)

M = molecular weight of vapors (use mw of toluene, 92.13)

T = Temperature of liquid (deg R) (assume ambient temp of 70 deg F, 530 deg R)

LL = 1.37 lb/1000 gal  
 Annual uncontrolled emissions = 4418.6 lb/yr  
 2.21 t/yr

Annual Controlled Emissions = 44.2 lb/yr (controlled using carbon canisters; assumed 99% efficient)  
 0.022 t/yr

**Appendix A: Emissions Calculations  
VOC and HAP  
From Lab Pack/DePack Operation (Unit 4)**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**Emissions from organic liquid depacking (LP B1 of Unit 4)**

Organic liquids are depacked in Booth 1 (LP B1).

Max 27375 containers/yr

Assumptions<sup>a</sup>:

75.5 gal/hr

7.5 lb/gal average density of depacked liquids

Uncontrolled emissions were expected to be low (materials are not agitated, heated, or exposed for long periods of time).

Estimate of emissions as % of quantity depacked: 0.10%

$$75.5 \text{ gal/hr} * 7.5 \text{ lb/gal} * 0.1\% = 0.56625 \text{ lb VOC/hr} \quad \mathbf{2.5 \text{ TPY VOC/HAP uncontrolled}}$$

$$\text{Estimated control efficiency of carbon adsorber packs: } 99\% \quad \mathbf{0.02 \text{ TPY VOC/HAP controlled}}$$

<sup>a</sup> These figures are estimates. LP B1 can also vent gaseous emissions from cylinders. However, the depacking of organic liquids is a worst case emissions scenario and therefore presented here.

**Emissions from the packing of dry chemicals (LP B4 of Unit 4) - insignificant activity**

Baghouse information:

Amount of particulate captured by baghouse per year:	275 lbs
Operating schedule of baghouse:	2,080 hrs/yr
Estimated capture efficiency of baghouse:	99.90%

(8 hrs/day, 5 days/week, 52 weeks/yr)

**Calculations:**

Amount of particulate captured by baghouse per 8,760 hrs:

$$275 \text{ lbs} * (8,760 \text{ hrs/yr}) / (2,080 \text{ hrs/yr}) * 1 \text{ ton} / 2,000 \text{ lbs} = 0.58 \text{ tons PM/yr}$$

Estimated uncontrolled particulate emissions per 8,760 hours:

$$0.58 \text{ tons PM/yr} / (1/0.999) = \mathbf{0.58 \text{ tons PM/yr uncontrolled}}$$

Note: Above calculations are from permit number T 089-29424-00345, issued on February 25, 2011.

**Appendix A: Emissions Calculations  
VOC from Degassing Operation**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**Emissions from Degassing Unit (After installation of flare)**

Type	Maximum Gas VOC Throughput* ton/yr	Maximum Gas HAP Throughput* ton/yr	VOC/HAP Absorbed %	Potential VOC Emissions Before Flare Control (tons/yr)	Potential HAP Emissions Before Flare Control (tons/yr)	Flare Control Efficiency %	Potential VOC Emissions After Flare Control (tons/yr)	Potential HAP Emissions After Flare Control (tons/yr)
Absorbable organics	396.8	14.1	98%	7.9	0.28	98%	0.2	0.01
Light end hydrocarbons	9.0	--	0%	9.0	--	98%	0.2	--
<b>Totals:</b>	405.8			<b>17.0</b>			<b>0.3</b>	<b>0.01</b>

**Emissions from Degassing Unit (Prior to installation of flare)**

Unit	Maximum Gas VOC Throughput* ton/yr	Maximum Gas HAP Throughput* ton/yr	VOC/HAP Absorbed %	Potential VOC Emissions Before Carbon Adsorber Control (tons/yr)	Potential HAP Emissions Before Carbon Adsorber Control (tons/yr)	Carbon Adsorber Unit Efficiency %	Potential VOC Emissions After Carbon Adsorber Control (tons/yr)	Potential HAP Emissions After Carbon Adsorber Control (tons/yr)
Degassing	198.4	3.1	98%	4.0	0.06	98%	0.1	0.00

\*Estimated maximum throughput provided by source based on historic mix of actual cylinders processed. 'Absorbable' gases processed include organic, inorganic, halogenated and inert.

Potential VOC/HAP Emissions Before Flare Control (ton/yr) = Maximum Gas Throughput VOC/HAP (ton/yr) × (1 - VOC/HAP Condensed (%))

Potential VOC/HAP Emissions After Flare Control (ton/yr) = Potential VOC/HAP Emissions Before Flare Control (ton/yr) × (1 - Flare Control Efficiency)

Note: Inorganic HAPs are Chlorine and Fluorine and Organic HAPs include 1,3 butadiene, ethylene oxide and others.

Note: The degassing operation includes a reactor tank into which gasses are vented and a pressurized "shock" tank that will condense gasses into liquids for collection and offsite shipment, with remaining gasses controlled by a flare or carbon canisters.

Note: The use of a flare control system allows cylinders to be degassed more quickly, as the flare can handle a higher air flow rate than is possible with carbon canisters. Further increases in throughput could only be accomplished through a change to a larger reactor or by the installation of a flare that could handle a higher air flow rate.

Note: The addition of a flare control system now allows for the degassing of cylinders containing light end hydrocarbons. These gases are not absorbed into liquid by the shock tank, and therefore assumed to be 100% emitted as VOC (0% absorbed).

**Appendix A: Emission Calculations  
VOC and HAP  
From the SDS Shredder (SDS)**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**From the SDS Shredder (SDS)**

Process Description:

Max. Throughput Rate: 4.0 tons/hr  
 VOC Emission Factor: 0.15 lbs/ton (This is provided by the source, based on the stack test results from a similar unit)

Control Equipment: Carbon Adsorption System for VOC/HAP Control  
 Control Efficiency: 99.0%

Potential to Emit VOC/HAP before Control:

Assume all the VOC emissions are equal to HAP emissions because the HAP contents in the received waste very greatly.

PTE of VOC/HAP before Control = 4 tons/hr x 0.15 lbs/ton x 8760 hr/yr x 1 ton/2000 lbs = **2.63 tons/yr**

Potential to Emit VOC/HAP after Control:

PTE of VOC/HAP after Control = 4 tons/hr x 0.15 lbs/ton x 8760 hr/yr x 1 ton/2000 lbs x (1- 99%) = **0.03 tons/yr**

VOC **Limited** 0.028 lb/hr  
 SDS Shredder **0.12** ton/yr

**From the SDS Shaker and conveyor**

Potential to Emit PM After Control:

Unit	Maximum Air Flow (acfm)	Design Outlet Grain Loading (gr/acf)	Overall control efficiency	After Control Emissions (lb/hr)	After Control Emissions (ton/yr)	Before Control Emissions (lb/hr)	Before Control Emissions (ton/yr)
SDS 04	4400	0.03	90%	1.13	5.0	11.31	49.6
SDS 09	2500	0.03	90%	0.64	2.8	6.43	28.2
Total					7.8		77.7

Note: These emissions were previously calculated based on maximum air flow of 500 acfm.  
 Assume all the PM emissions are equal to PM10 emissions.

**Appendix A: Emission Calculations  
VOC and HAP Emissions  
From the Anaerobic Thermal Desorption Unit (ATDU)**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**Process Description:**

Max. Throughput Rate: 4.0 tons/hr  
 Max. Flow Rate: 75 acfm  
 Max. Inlet VOC Concentration\*: 10,000 ppm  
 Control Equipment: Carbon Adsorption System for VOC/HAP Control  
 Control Efficiency: 99.0%

\*This is provided by the source, based on the trial results in April 2003

**Potential to Emit VOC/HAP before Control:**

Since the VOC/HAP concentration in the received waste is expected to be highly variable, assume all the VOC emissions are equal to HAP emissions. In order to estimate PTE of VOC, assume all VOC are ethylene, which has a vapor density of 0.075 lbs/ft<sup>3</sup>.

PTE before Control (lbs/hr) = 75 ft <sup>3</sup> /min x 60 min/hr x 10,000 ppm x 1/1000,000 ppm x 0.075 lbs	3.38 lbs/hr
PTE before Control (tons/yr) = 3.38 lbs/hr x 8760 hr/yr x 1 ton/2000 lbs =	<b>14.8 tons/yr</b>

**Limited VOC:**

Limited	0.169	lb/hr
SDS (w/o shredder)	0.74	ton/yr

**Potential to Emit VOC/HAP after Control:**

PTE after Control (lbs/hr) = 75 ft <sup>3</sup> /min x 60 min/hr x 10,000 ppm x 1/1000,000 ppm x 0.075 lbs/ft <sup>3</sup> x (1-99%) =	0.03
PTE after Control (tons/yr) = 14.8 tons/yr x (1- 99%) =	0.15

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)**

**From the NG Combustion in Anaerobic Thermal Desorption Unit (ATDU)**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

Heat Input Capacity  
MMBtu/hr  
10.0

Potential Throughput  
MMCF/yr  
87.6

	Pollutant						
	PM*	PM10*	PM2.5	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.08</b>	<b>0.33</b>	<b>0.33</b>	<b>0.03</b>	<b>4.38</b>	<b>0.24</b>	<b>3.68</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100.

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

**Methodology**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

Note: Above calculations are from permit number T 089-29424-00345, issued on February 25, 2011.

**HAPS Calculations**

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	9.2E-05	5.3E-05	3.3E-03	0.08	1.5E-04	<b>0.08</b>

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	2.2E-05	4.8E-05	6.1E-05	1.7E-05	9.2E-05	<b>2.4E-04</b>
					<b>Total HAPs</b>	<b>0.08</b>
					<b>Worst HAP</b>	<b>0.08</b>

Methodology is the same as above.

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

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Greenhouse Gas Calculations**

	Greenhouse Gas*		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	5,256	0	0
Summed Potential Emissions in tons/yr	5,256		
CO2e Total in tons/yr	5,287		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

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

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

\*CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emission Calculations  
VOC and HAP Emissions  
From the Distillation Unit**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**Process Description:**

Max. Throughput Rate: 1.0 ton/hr  
 VOC Emission Factor: 0.52 lbs/ton (This is provided by the manufacturer)  
 Control Equipment: Carbon Adsorption System for VOC/HAP Control  
 Control Efficiency: 99.0%

**Potential to Emit VOC/HAP before Control:**

Assume all the VOC emissions are equal to HAP emissions because the HAP contents in the received waste very greatly.

**PTE of VOC/HAP before Control** = 1 tons/hr x 0.52 lbs/ton x 8760 hr/yr x 1 ton/2000 lbs = **2.28 tons/yr**

**Potential to Emit VOC/HAP after Control:**

**PTE of VOC/HAP after Control** = 1 tons/hr x 0.52 lbs/ton x 8760 hr/yr x 1 ton/2000 lbs x (1- 99%) = **0.02 tons/yr**

Note: Above calculations are from permit number T 089-29424-00345, issued on February 25, 2011.

Limited	lb/hr	ton/yr
Distillation Unit	0.014	0.06

**Appendix A: Emission Calculations  
Tank VOC Emissions**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

Emission Unit	Tank Volume	Working Loss	Breathing Loss	VOC Total Emissions			
	Gallons	lbs/year	lbs/year	lbs/year	TPY	lbs/day	lbs/hr
52	12,000	77.8	0.0	77.8	0.04	0.21	0.01
53	12,000	77.8	0.0	77.8	0.04	0.21	0.01
54	12,000	77.8	0.0	77.8	0.04	0.21	0.01
55	20,000	646.9	206.2	853.1	0.43	2.34	0.10
57	20,000	646.9	206.2	853.1	0.43	2.34	0.10
58	20,000	646.9	206.2	853.1	0.43	2.34	0.10
59	6,000	360.9	0.0	360.9	0.18	0.99	0.04
60	6,000	360.9	0.0	360.9	0.18	0.99	0.04
61	20,000	646.9	206.2	853.1	0.43	2.34	0.10
62	12,000	77.8	0.0	77.8	0.04	0.21	0.01
63	12,000	77.8	0.0	77.8	0.04	0.21	0.01
64	12,000	77.8	0.0	77.8	0.04	0.21	0.01
65	12,000	77.8	0.0	77.8	0.04	0.21	0.01
66	12,000	77.8	0.0	77.8	0.04	0.21	0.01
67	12,000	77.8	0.0	77.8	0.04	0.21	0.01

**Total      4834.4      2.4**

Note: Storage tank emissions are estimated using USEPA's Tanks 4.0.9D software program and provided by the source.

**Appendix A: Emissions Calculations  
VOC and HAP  
From HWF Shipping and Receiving (Unit 2)**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

Emissions from the proposed Pot Still have been estimated based on potential emissions from the existing Distillation Unit. Most recent VOC collection from the Distillation Unit is summarized below:

Carbon Canisters utilized since October 1 = 5 canisters;  
 Distillation Unit throughput since October 1 = 160,000 gallons;  
 Carbon weight = 200 pounds per canister;  
 VOC adsorption rate assumed to be 0.25 pounds per pounds of carbon  
 (expected adsorption rate = 0.2 to 0.3 pounds VOC per pound of carbon);  
 Uncontrolled VOC since October 1 = 5 canisters x 200lb carbon/canister x 0.25 lb VOC/lb = 250 lb. VOC  
 Uncontrolled VOC emission factor = 250 lb VOC/160,000 gal throughput = 1.56 lb VOC/1000 gal

**Total:** 1.56 lb VOC/1000 gal processed x 70 gal/hr x 24 hr/day x 365 day/yr = 0.48 ton/yr.

Note: Above calculations are from permit number T 089-29424-00345, issued on February 25, 2011.  
 Note: Based on conservative assumption, HAPs are equal to VOC.

**Appendix A: Emission Calculations  
Natural Gas Combustion (MMBtu/hr < 100)**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**Thin Film Evaporator**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.4	21.0

	Pollutant						
	PM*	PM10*	PM2.5	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
Combustion							
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.02</b>	<b>0.08</b>	<b>0.08</b>	<b>0.01</b>	<b>1.05</b>	<b>0.06</b>	<b>0.88</b>
					<b>Additional VOC</b>	<b>0.03</b>	
					<b>Total VOC</b>	<b>0.09</b>	

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100.

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

**Methodology**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

**HAPS Calculations**

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	2.2E-05	1.3E-05	7.9E-04	0.02	3.6E-05	<b>0.02</b>

  

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	5.3E-06	1.2E-05	1.5E-05	4.0E-06	2.2E-05	<b>5.8E-05</b>
					<b>Total HAPs</b>	<b>0.02</b>
					<b>Worst HAP</b>	<b>0.02</b>

Methodology is the same as above.

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

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Greenhouse Gas Calculations**

	Greenhouse Gas*		
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,261	0.02	0.02
Summed Potential Emissions in tons/yr		1,261	
CO <sub>2</sub> e Total in tons/yr		1,269	

**Methodology**

The N<sub>2</sub>O Emission Factor for uncontrolled is 2.2. The N<sub>2</sub>O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

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

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

\*CO<sub>2</sub>e (tons/yr) based on 11/29/2013 federal GWPs= CO<sub>2</sub> Potential Emission ton/yr x CO<sub>2</sub> GWP (1) + CH<sub>4</sub> Potential Emission ton/yr x CH<sub>4</sub> GWP (25) + N<sub>2</sub>O

Potential Emission ton/yr x N<sub>2</sub>O GWP (298).

**Appendix A: Emission Calculations  
Natural Gas Combustion (MMBtu/hr < 100)**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**Hot Oil Heater**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.5	21.9

	Pollutant						
	PM*	PM10*	PM2.5	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.02</b>	<b>0.08</b>	<b>0.08</b>	<b>0.01</b>	<b>1.10</b>	<b>0.06</b>	<b>0.92</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100.

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

**Methodology**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

**HAPS Calculations**

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	2.3E-05	1.3E-05	8.2E-04	0.02	3.7E-05	<b>0.02</b>

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	5.5E-06	1.2E-05	1.5E-05	4.2E-06	2.3E-05	<b>6.0E-05</b>
					<b>Total HAPs</b>	<b>0.02</b>
					<b>Worst HAP</b>	<b>0.02</b>

Methodology is the same as above.

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

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Greenhouse Gas Calculations**

	Greenhouse Gas*		
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,314	0.03	0.02
Summed Potential Emissions in tons/yr	1,314		
CO <sub>2</sub> e Total in tons/yr	1,322		

**Methodology**

The N<sub>2</sub>O Emission Factor for uncontrolled is 2.2. The N<sub>2</sub>O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

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

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

\*CO<sub>2</sub>e (tons/yr) based on 11/29/2013 federal GWPs= CO<sub>2</sub> Potential Emission ton/yr x CO<sub>2</sub> GWP (1) + CH<sub>4</sub> Potential Emission ton/yr x CH<sub>4</sub> GWP (25) + N<sub>2</sub>O Potential Emission ton/yr x N<sub>2</sub>O GWP (298).

**Appendix A: Emissions Calculations**  
**Fugitive PM**  
**From Paved/Unpaved Roads and Storage Piles**

**Company Name:** Tradebe Treatment and Recycling LLC  
**Source Address:** 4343 Kennedy Avenue, East Chicago, IN 46312  
**Permit Number:** MSM 089-34241-00345 and MPM 089-34282-00345  
**Reviewer:** Heath Hartley

**Truck Dumping**  
 $E = k(0.0032) * (U/5)^{1.3} / (M/2)^{1.4}$

E = Emission Factor (lbs/ton)  
k = 0.35 particle size multiplier for PM-10  
0.74 particle size multiplier for PM  
U = 10.3 mean wind speed (mph)  
M = 5 material moisture content (fraction)

PM Emission Factor:

E = 0.00168 lb/ton

PM-10 Emission Factor:

$E = (0.35)(0.0032) * (12.7/5)^{1.3} / (10\%/2)^{1.4}$   
E = 0.00079 lb/ton

Annual potential amount of dry material delivered by truck = 1980 tpy  
Potential PM Emissions (tons/year) = Emission factor (lb/ton) \* Gypsum delivered (tpy) / 2000 (lbs/ton)  
Potential PM Emissions (tons/year) = **0.0017 tpy**  
Potential PM-10 Emissions (tons/year) = Emission factor (lb/ton) \* Gypsum delivered (tpy) / 2000 (lbs/ton)  
Potential PM-10 Emissions (tons/year) = **0.0008 tpy**

**Paved Roads**

Maximum Vehicular Speed:  
Average Distance of Haul:

5 mph  
0.15 miles

Vehicle Type	No. of One Way Trips per Hour	Weight
Tanker	0.29	37.5
Vans	0.25	35
Roll Off Boxes	0.08	35
Dump Truck	0.04	37.5
total	0.66	

Weighted Average Gross Weight:

36.25 tons

Calculations:

$E = k(sL/2)^{0.65} * (W/3)^{1.5}$   
E = Emission factor (lbs/vehicle miles traveled(VMT))  
k = 0.016 particle size multiplier for PM-10  
0.082 particle size multiplier for PM  
sL = 3 road surface silt content (g/m<sup>2</sup>)  
W = 36.25 weighted average vehicle weight (tons) (calculate from table above)

source: AP-42, chapter 13.2.1, p. 13.2.1-6.

VMT=

867.24 (miles/yr)

PM

E = 4.48 lbs/VMT

Potential PM Emissions (ton/yr) = Emission factor (lbs/VMT) \* VMT / 2000 (lbs/ton)

Potential PM Emissions (ton/yr) = **1.94 tpy**

PM-10

E = 0.87 lbs/VMT

Potential PM-10 Emissions (ton/yr) = Emission factor (lbs/VMT) \* VMT / 2000 (lbs/ton)

Potential PM-10 Emissions (ton/yr) = **0.38 tpy**



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

**TO:** Tita LaGrimas  
Tradebe Treatment and Recycling LLC  
4343 Kennedy Avenue  
East Chicago, IN 46312

**DATE:** August 7, 2014

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

**SUBJECT:** Final Decision  
Title V Minor Permit Modification  
089-34282-00345

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:  
David Jordan, Environmental Resources Management (ERM)  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

August 7, 2014

TO: Pastrick Branch / East Chicago Public Library

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

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

**Applicant Name: Tradebe Treatment and Recycling LLC**  
**Permit Number: 089-34282-00345**

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

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

Enclosures  
Final Library.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	VHAUN 8/7/2014 Tradebe Treatment and Recycling LLC 089-34282-00345 FINAL			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	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Tita LaGrimas Tradebe Treatment and Recycling LLC 4343 Kennedy Avenue East Chicago IN 46312 (Source CAATS)					CONFIRMED DELIVERY					
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		East Chicago Public Library 1008 W. Chicago Ave. East Chicago IN 46312 (Library)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
6		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
7		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
8		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
9		David Jordan Environmental Resources Management (ERM) 11350 North Meridian, Suite 320 Carmel IN 46032 (Consultant)										
10		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
11		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
12		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
13		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
14		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
15		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										

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

# Mail Code 61-53

IDEM Staff	VHAUN 8/7/2014 Tradebe Treatment and Recycling LLC 089-34282-00345 FINAL		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	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
2		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
3		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
4		Ryan Dave 939 Cornwallis Munster IN 46321 (Affected Party)										
5		Matt Mikus 1710 Vale Park Rd Apt 302 Valparaiso IN 46383 (Affected Party)										
6												
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9												
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11												
12												
13												
14												
15												

Total number of pieces Listed by Sender  <b>5</b>	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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