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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Signficant Modification to a
Part 70 Operating Permit

for Covanta Indianapolis, Inc. in Marion County

Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123

The Indiana Department of Environmental Management (IDEM) has received an application from Covanta Indianapolis, Inc., located at 2320 S. Harding Street, Indianapolis, IN 46221, for a significant modification of its Part 70 Operating Permit issued on September 19, 2014. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Covanta Indianapolis, Inc. to make certain changes at its existing source. Covanta Indianapolis, Inc. has applied to construct an advanced recycling center (ARC).

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Indianapolis Public Library - West Indianapolis Branch
1216 S. Kappes Street
Indianapolis, IN 46221

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you

do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 097-35573-00123 and SPM 097-35639-00123 in all correspondence.

Comments should be sent to:

David Matousek
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 2-8253
Or dial directly: (317) 232-8253
Fax: (317) 232-6749 attn: David Matousek
E-mail: dmatouse@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact David Matousek of my staff at the above address.

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

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Thomas W. Easterly
Commissioner

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Brian Foster
Covanta Indianapolis, Inc.
2320 S. Harding Street
Indianapolis, Indiana 46221

Re: 097-35573-00123
Significant Source Modification

Dear Brian Foster,

Covanta Indianapolis, Inc. was issued Part 70 Operating Permit Renewal No. T097-32931-00123 on September 19, 2014, for a stationary municipal solid waste combustion facility located at 2320 S. Harding Street, Indianapolis, Indiana 46221. An application to modify the source was received on March 10, 2015. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(b) One (1) Advanced Recycling Center (ARC) for recovering ferrous and non-ferrous metals, paper, corrugated cardboard, and plastics from a portion of the incoming municipal solid waste (MSW) stream, identified as Unit 004, approved in 2015 for construction, with a design capacity of 50 tons per hour, consisting of the following equipment:

(1) One (1) MSW Delivery Point at the western entrance to the site using the existing four (4) automated truck scales to provide an accounting of the waste delivered to and the recyclables and residue removed from the ARC, with no controls and vented to the outdoors through the general building ventilation system;

(2) One (1) Enclosed MSW Storage Area with overhead doors and a tipping floor having a maximum storage capacity of approximately 735 tons of MSW, with no controls and vented to the outdoors through the general building ventilation system;

(3) One (1) Pre-Sort Area, with no controls and vented to the outdoors through the general building ventilation system, where waste received at the tipping floor is presorted into the following parts:

(A) Old Corrugated Cardboard;
(B) Large Items; and
(C) Propane Tanks and Large Metals.

(4) One (1) Bag Opener/Size Reducer to open returned bags of waste and process feed from the Pre-Sort Area, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(5) One (1) Overbelt Magnet to recover ferrous metal from the processed waste stream, with no controls and vented to the outdoors through the general building ventilation system;

(6) One (1) Trommel (No.2) for size classification with large items returned to the Pre-Sort Area for reprocessing or removal from the process, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(7) One (1) Trommel (No. 110) for further size classification, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(8) One (1) Walair Separator (No. 470) which separates Medium/Heavy and Light Density materials from the Trommel No. 110 overs stream, controlled by a baghouse, identified as CE6, and exhausting to the outdoors;

(9) One (1) Star Screen to size sort materials from the Trommel No. 110 unders stream, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(10) One (1) Walair Separator (No. 250) which separates Medium/Heavy and Light Density materials from the Star Screen overs stream, controlled by a baghouse, identified as CE5, and exhausting to the outdoors;

(11) Two (2) Ballistic Separators (No. 800 and No. 630) to process the Medium/Heavy materials separated by the Walair Separators, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(12) One (1) Eddy Current Separator to recover non-ferrous metals from the materials sorted by the Ballistic Separators and the Star Screen, with no controls and vented to the outdoors through the general building ventilation system;

(13) One (1) Fines Star Screen to process non-ferrous materials from the Ballistic Separators and the Eddy Current Separator, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(14) Twelve (12) Titech Optical Sorters to sort and recover small mixed paper, large mixed paper, OCC, plastic, polyethylene terephthalate, high-density polyethylene, polypropylene from non-recyclable waste material, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(15) One (1) Baler and Bale Storage Area located in the western end of the ARC for packaging and storage of recyclables prior to shipment to markets, controlled by a baghouse, identified as CE4;

(16) Ten (10) conveyor belt transfer points, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(17) One (1) Recyclables Loadout Area located in the northwestern corner of the ARC and consisting of a flush loading dock design with four (4) truck bays equipped with roll-up doors, with no controls and vented to the outdoors through the general building ventilation system;

(18) One (1) Remaining MSW Exit Point consisting of an enclosed, inclined conveyor for the transport of the remaining MSW from the ARC to a single gravity-fed chute located in the northwestern corner of the tipping floor of the adjacent Indianapolis Resource Recovery Facility, with no controls and vented to the outdoors through the general building ventilation system and used as combustion air within the Indianapolis Resource Recovery Facility; and

(19) One (1) Fines Loadout Area located at the southern interior wall of the proposed ARC and consisting of two (2) truck bays where fines, including dirt, broken glass and small pieces of paper, which have been conveyed into 40 cubic yard containers within the ARC, will be loaded onto trucks for disposal at a licensed landfill, controlled by a baghouse, identified as CE4, and exhausting to the outdoors.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

   Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

   Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

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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.

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

If you have any questions on this matter, please contact David Matousek 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 David Matousek or extension 2-8253 or dial (317) 232-8253.

Sincerely,

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

Attachments: Significant Source Modification and Technical Support Document

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

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Significant Source Modification to a Part 70 Source

OFFICE OF AIR QUALITY

Covanta Indianapolis, Inc.
2320 S. Harding Street
Indianapolis, Indiana 46221

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

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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No.: 097-35573-00123	
Issued by: Nathan Bell, Section Chief, Permits Branch Office of Air Quality	Issuance Date:

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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)]

The Permittee owns and operates a stationary municipal solid waste combustion facility.

Source Address:	2320 S. Harding Street, Indianapolis, Indiana 46221
General Source Phone Number:	317-532-6712
SIC Code:	4953
County Location:	Marion County (Center Township)
Source Location Status:	Nonattainment for SO_2 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, under Emission Offset Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories Greenhouse Gas (GHG) potential to emit (PTE) greater than one hundred thousand (100,000) tons of CO_2 equivalent (CO_2e) emissions per year.

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) Three (3) mass burn waterwall municipal solid waste combustion units, constructed in 1988, identified as EU1, EU2, and EU3. Each unit is capable of burning municipal solid waste at a rate of 726 tons per day at 5500 Btu/lb. Each Combustor unit is equipped with two (2) 140 MMBtu per hour natural gas-fired burners used for start-up, shutdown, and flame stabilization.

(1) The flue gas from each combustion unit is controlled by:

(A) a spray dryer absorber with hydrated lime slurry controlling acid gas, identified as CE1A, CE2A, and CE3A;

(B) fabric filter bags controlling particulates, identified as CE1B, CE2B, and CE3B in parallel; exhausting to stack vents SV1, SV2, and SV3, with CEMS for NOx, CO, SO_2, O_2 and a COM for opacity;

(C) a Mercury Emissions Control System comprised of:

(i) three (3) outlet hoppers for each combustion unit; three (3) surge bins, one for each combustion unit, each equipped with gravimetric feeders for controlling the carbon feed rate to each combustion unit, and

(ii) three (3) injection trains equipped with pneumatic conveying equipment to transport (blow) the carbon from the feeder to the flue gas duct of each combustion unit.

(D) a Nitrogen Oxide Emission Control System utilizing one (1) selective non catalytic reduction (SNCR) system comprised of:

(i) one (1) 20,000 gallon, aqueous ammonia storage tank;

(ii) two (2) ammonia feed pumps to supply ammonia from the storage tank to the injection nozzle system; and

(iii) three (3) injection nozzle systems equipped with carrier blowers.

(2) A Fugitive Ash Emission Control System utilizing one (1) dustmaster fly ash conditioning system comprised of:

(A) five (5) screw conveyors that convey ash from the three (3) scrubber-baghouse units to the ash storage silo;

(B) one (1) ash storage silo that batch feeds the fly ash into the dustmaster conditioning system; and

(C) one (1) dustmaster fly ash conditioning system that mixes water and fly ash to produce consistent moisture content that reduces fugitive dust.

(3) Each combustor is equipped with a Liquid Direct Injection (LDI) System, including multiple nozzles for product dispersion. Additional components include two (2) 150,000 gallon mixing tanks and one (1) 10,000 gallon storage tank.

(b) One (1) Advanced Recycling Center (ARC) for recovering ferrous and non-ferrous metals, paper, corrugated cardboard, and plastics from a portion of the incoming municipal solid waste (MSW) stream, identified as Unit 004, approved in 2015 for construction, with a design capacity of 50 tons per hour, consisting of the following equipment:

(1) One (1) MSW Delivery Point at the western entrance to the site using the existing four (4) automated truck scales to provide an accounting of the waste delivered to and the recyclables and residue removed from the ARC, with no controls and vented to the outdoors through the general building ventilation system;

(2) One (1) Enclosed MSW Storage Area with overhead doors and a tipping floor having a maximum storage capacity of approximately 735 tons of MSW, with no controls and vented to the outdoors through the general building ventilation system;

(3) One (1) Pre-Sort Area, with no controls and vented to the outdoors through the general building ventilation system, where waste received at the tipping floor is presorted into the following parts:

(A) Old Corrugated Cardboard;
(B) Large Items; and
(C) Propane Tanks and Large Metals.

(4) One (1) Bag Opener/Size Reducer to open returned bags of waste and process feed from the Pre-Sort Area, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(5) One (1) Overbelt Magnet to recover ferrous metal from the processed waste stream, with no controls and vented to the outdoors through the general building ventilation system;

(6) One (1) Trommel (No.2) for size classification with large items returned to the Pre-Sort Area for reprocessing or removal from the process, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(7) One (1) Trommel (No. 110) for further size classification, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(8) One (1) Walair Separator (No. 470) which separates Medium/Heavy and Light Density materials from the Trommel No. 110 overs stream, controlled by a baghouse, identified as CE6, and exhausting to the outdoors;

(9) One (1) Star Screen to size sort materials from the Trommel No. 110 unders stream, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(10) One (1) Walair Separator (No. 250) which separates Medium/Heavy and Light Density materials from the Star Screen overs stream, controlled by a baghouse, identified as CE5, and exhausting to the outdoors;

(11) Two (2) Ballistic Separators (No. 800 and No. 630) to process the Medium/Heavy materials separated by the Walair Separators, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(12) One (1) Eddy Current Separator to recover non-ferrous metals from the materials sorted by the Ballistic Separators and the Star Screen, with no controls and vented to the outdoors through the general building ventilation system;

(13) One (1) Fines Star Screen to process non-ferrous materials from the Ballistic Separators and the Eddy Current Separator, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(14) Twelve (12) Titech Optical Sorters to sort and recover small mixed paper, large mixed paper, OCC, plastic, polyethylene terephthalate, high-density polyethylene, polypropylene from non-recyclable waste material, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(15) One (1) Baler and Bale Storage Area located in the western end of the ARC for packaging and storage of recyclables prior to shipment to markets, controlled by a baghouse, identified as CE4;

(16) Ten (10) conveyor belt transfer points, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(17) One (1) Recyclables Loadout Area located in the northwestern corner of the ARC and consisting of a flush loading dock design with four (4) truck bays equipped with roll-up doors, with no controls and vented to the outdoors through the general building ventilation system;

(18) One (1) Remaining MSW Exit Point consisting of an enclosed, inclined conveyor for the transport of the remaining MSW from the ARC to a single gravity-fed chute located in the northwestern corner of the tipping floor of the adjacent Indianapolis Resource Recovery Facility, with no controls and vented to the outdoors through the general building ventilation system and used as combustion air within the Indianapolis Resource Recovery Facility; and

(19) One (1) Fines Loadout Area located at the southern interior wall of the proposed ARC and consisting of two (2) truck bays where fines, including dirt, broken glass and small pieces of paper, which have been conveyed into 40 cubic yard containers within the ARC, will be loaded onto trucks for disposal at a licensed landfill, controlled by a baghouse, identified as CE4, and exhausting to the outdoors.

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

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

(a) Lime Silo equipped with a vent fabric filter for particulate control. [326 IAC 6.5]

(b) One (1) dry activated carbon storage silo associated with the Mercury Emissions Control System equipped with an integrated baghouse system with a maximum storage capacity of 3,000 cubic feet. [326 IAC 6.5]

(c) Carbide Lime System, to be constructed in 2014. [326 IAC 6.5]

(d) Space heaters powered by steam from the three (3) mass burn waterwall municipal solid waste combustion units, EU1, EU2, and EU3.

(e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour. [326 IAC 6.5]

(f) Combustion source flame safety purging on startup.

(g) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(h) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(j) Closed loop heating and cooling systems.

(k) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(l) Replacement or repair of bags in baghouses, and filters in other air filtration equipment.

(m) Heat exchanger cleaning and repair.

(n) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
[326 IAC 6.5][326 IAC 6-5]

(o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and handling equipment.

(p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(q) Emergency equipment: Stationary fire pumps. [326 IAC 6.5]

These units are affected facilities under 40 CFR 63, Subpart ZZZZ.

(r) Purge double block and bleed valves.

(s) Filter or coalescer media changeout.

(t) Vents from ash transport systems not operated at positive pressure. [326 IAC 6.5]

(u) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(v) One (1) sand blaster, used for maintenance purposes only, using dust collector as control, constructed in 1988, and exhausting indoors. [326 IAC 6.5]

A.4 Insignificant Activities [326 IAC 2-7-1(21)]

This source contains the following insignificant activities, which are not specifically regulated:

(a) Wastewater Minimization System, approved in 2014 for construction, and consisting of the following:

(1) Two (2) 32,500 gallon fiberglass wastewater storage tanks, each with an approximate 350 GPM supply pump;

(2) One (1) pump skid capable of supplying approximately 120 GPM of water at 150 psi to the water reuse system;

(3) One (1) fifteen cubic foot filter press, with two-filter press pumps;

(4) Two (2) sludge pumps feeding the ash dischargers; and

(5) Miscellaneous valves, meters, piping and electrical equipment.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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).

(c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);

SECTION B GENERAL CONDITIONS

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

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

The following are definitions of specific terms used in this ROP to supplement those provided by state and federal rules. Terms not otherwise defined are to be interpreted in a general, common knowledge sense.

MSW

Municipal solid waste and/or solid waste as defined by 40 CFR 60.51(b).

Emission Guideline(s)

All applicable portions of **40 CFR 60, Subpart Cb** –"Emissions Guidelines and Compliance Times For Large Municipal Waste Combustors That Are Constructed On Or Before September 20, 1994", and the portions of **40 CFR 60, Subpart Eb** – "Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994 or For Which Modification or Reconstruction is Commenced After June 19, 1996" referenced therein.

Startup (for purposes of Emission Guideline requirements):

The setting in operation of the affected facility for any purpose. **(40 CFR 60.2)**

The Emission Guideline standards do not apply during period of startup. The duration of startup periods is limited to 3 hours per occurrence. **(40 CFR 60.58b(a)(1))**

During periods of startup, shutdown, or malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported in accordance with the provisions of 40 CFR 60.59b(d)(7). **(40 CFR 60.58b(a)(1)(i))**

The startup period commences when the affected facility begins the continuous burning of municipal solid waste and does not include any warm-up period when the affected facility is combusting fossil fuel or other non-municipal solid waste fuel, and no municipal solid waste is being fed to the combustor. **(40 CFR 60.58b(a)(1))**

Continuous burning is the continuous, semi-continuous, or batch feeding of municipal solid waste for purposes of waste disposal, energy production, or providing heat to the combustion system in preparation for waste disposal or energy production. The use of municipal solid waste solely to provide thermal protection of the grate or hearth during the startup period when municipal solid waste is not being fed to the grate is not considered to be continuous burning. **(40 CFR 60.58b(a)(1)(ii))**

The period when no MSW is being fed to the grate and the boilers are being fired solely on natural gas is not part of the Emission Guideline startup period.

Shutdown (for purposes of Emission Guideline requirements):

The cessation of operation of an affected facility for any purpose. **(40 CFR 60.2)**

The Emission Guideline standards do not apply during periods of shutdown. The duration of the shutdown period is limited to 3 hours per occurrence, except as allowed by **40 CFR 60.58b(a)(1)(iii)**.

During periods of startup, shutdown, or malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported in accordance with the provisions of 40 CFR 60.59b(d)(7). **(40 CFR 60.58b(a)(1)(i))**

The shutdown period commences 30 minutes after the affected facility begins the shutdown process or procedure necessary to end the continuous burning of municipal solid waste as evidenced by the feed chute damper being closed.

The shutdown period ends and the affected facility is "off line" when the oxygen concentration in the flue gas is sustained at a value greater than or equal to 16%. Note, however, for SO_2 and NO_x, 40 CFR 60.58b(b)(8) allows a diluent cap of 14%. This option is available for definition of shutdown periods for these limits.

When the facility is "off line" it shall not be considered to be operating.

Malfunction (for purposes of Emission Guideline requirements):

"Malfunction" means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal, or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 60.2)**

Durations of malfunction periods are limited to 3 hours per occurrence, except if a malfunction is caused by a loss of boiler water level or a loss of combustion air control, then as provided in 40 CFR 60.58b(a)(1)(iii), for CO limits the malfunction period is extended to 15 hours per occurrence. During periods of startup, shutdown, or malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported in accordance with the provisions of 40 CFR 60.59b(d)(7). **(40 CFR 60.58b(a)(1)(i))**

For the purpose of compliance with CO emission limits, if a loss of boiler water level control (e.g. boiler waterwall tube failure) or a loss of combustion air control (e.g., loss of combustion air fan, induced draft fan, combustion grate bar failure) is determined to be a malfunction, the duration of the malfunction period is limited to 15 hours per occurrence. During such periods of malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported in accordance with the provisions of 40 CFR 60.59b(d)(7). **(40 CFR 60.58b(a)(1)(iii))**

CEM Data Point:

A valid CEM data point is produced when a CEM (except COM) completes a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. **(40 CFR 60.13(e)(2))**

One-Hour Average:

One-hour averages shall be computed from four or more data points equally spaced over each 1-hour period. **(40 CFR 60.13(h))**

At least two data points per hour shall be used to calculate each 1-hour average. **(40 CFR 60.58b)** [For example, **40 CFR 60.58b(e)(7)(i)**]

If at least two data points are not available to calculate a 1-hour average the period is not considered in determining compliance with a standard.

One-Hour period:

Any 60-minute period commencing on the hour. **(40 CFR 60.2)**

Block Average (General):

A block average is the period that starts on the hour and ends on the hour, and encompasses the same hours each day.

Partial Block Period (for block periods greater than one-hour):

A block period that does not have MSW continuously burning due to start up or shutdown or the unit being off line, or which has an exemption of data use due to startup, shutdown, or malfunction exclusion provisions under the Emission Guidelines. The exemption of data use under the Emission Guidelines may create a partial block period. Emission standards or limitations applicable to block periods are not applicable to partial block periods.

Block Average (for purposes of Emission Guideline requirements):

Four-hour block average or 4-hour block average means the average of all hourly emission concentrations when the affected facility is operating and combusting municipal solid waste measured over 4-hour periods of time from 12:00 midnight to 4 a.m., 4 a.m. to 8 a.m., 8 a.m. to 12:00 noon, 12:00 noon to 4 p.m., 4 p.m. to 8 p.m., and 8 p.m. to 12:00 midnight. **(40 CFR 60.51b)**

Twenty Four-hour block average or 24-hour block average means the average of all hourly emission concentrations when the affected facility is operating and combusting municipal solid waste measured over the 24 hour period of time from 12:00 midnight to the following 12:00 midnight. **(40 CFR 60.51b)**

Except for “geometric averages or geometric means”, block averages shall be determined by dividing the sum of the hourly averages by the number of hours in a block. In the event there is no valid data (or there is only exempt data) for one of the hours in a block period, then a block average cannot be determined for that block period.

In the event that two valid data points cannot be determined for any one hour average, then this average is not valid for that block period, thus creating a “partial block period”.

Daily Geometric Mean/Average

When a “24-hour daily geometric mean” [daily geometric average] is to be determined, this shall be done for a single 24 hour period each day, that being the 24 hour block period that runs from midnight to midnight.

24-hour daily arithmetic average

When a “24-hour daily arithmetic average” is to be determined, this shall be done for a single 24 hour period each day, that being the 24 hour block period that runs from midnight to midnight.

Good Combustion Practices (GCP)

As defined by U.S. EPA (1989), good combustion practices (GCP) for municipal waste combustors are designed to prevent and control air pollutant emissions. GCP incorporates numeric limits for three specific combustor operating parameters: CO emissions, maximum operating load, and minimum temperature of flue gases at the PM control device. Each of these parameters is continuously monitored for each combustor.

Annual Basis for Testing

For the purposes of required emissions testing, an "annual basis" or "calendar year basis" means repeated testing no less than 9 calendar months and no more than 15 calendar months following the previous performance test, but completing five performance tests in each 5-year calendar period.

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)]

(a) This permit, T097-32931-00123, 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 or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(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]

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]

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)]

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)]

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)]

(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]

(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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(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]

(a) All terms and conditions of permits established prior to T097-32931-00123 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 permit, all previous registrations and permits are superseded by this Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

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

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]

(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(42). 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] [40 CFR 72]

(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) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

(c) 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).

(d) 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)]

(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]

(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(37)) 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.

(f) This condition does not apply to emission trades of SO_2 or NO_X under 326 IAC 21 or 326 IAC 10-4.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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]

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 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(c) The municipal solid waste combustion units (EU1, EU2, and EU3) are each not subject to the requirements of 326 IAC 5, because they each are subject to specific opacity limitations under 326 IAC 11.

C.2 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.3 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.4 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.5 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment C.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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]

(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]

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)]

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.

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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 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.15 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.16 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]

Pursuant to 326 IAC 2-6-3(b)(2), starting July 1, 2014 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

(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) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(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.

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Three (3) mass burn waterwall municipal solid waste combustion units, constructed in 1988, identified as EU1, EU2, and EU3. Each unit is capable of burning municipal solid waste at a rate of 726 tons per day at 5500 Btu/lb. Each Combustor unit is equipped with two (2) 140 MMBtu per hour natural gas-fired burners used for start-up, shutdown, and flame stabilization.

(1) The flue gas from each combustion unit is controlled by:

(A) an acid gas scrubber comprised of a spray dryer absorber with hydrated lime slurry for controlling acid gas, identified as CE1A, CE2A, and CE3A;

(B) fabric filter bags for controlling particulates, identified as CE1B, CE2B, and CE3B in parallel; exhausting to stack vents SV1, SV2, and SV3, with CEMS for NO_x, CO, SO_2, O_2 and a COM for opacity;

(C) a Mercury Emissions Control System utilizing a carbon injection system comprised of:

(i) three (3) outlet hoppers for each combustion unit; three (3) surge bins, one for each combustion unit, each equipped with gravimetric feeders for controlling the carbon feed rate to each combustion unit; and

(ii) three (3) injection trains equipped with pneumatic conveying equipment to transport (blow) the carbon from the feeder to the flue gas duct of each combustion unit.

(D) a Nitrogen Oxide Emission Control System utilizing one (1) selective non catalytic reduction (SNCR) system comprised of:

(i) one (1) 20,000 gallon, aqueous ammonia storage tank;

(ii) two (2) ammonia feed pumps to supply ammonia from the storage tank to the injection nozzle system; and

(iii) three (3) injection nozzle systems equipped with carrier blowers.

(2) A Fugitive Ash Emission Control System utilizing one (1) dustmaster fly ash conditioning system comprised of:

(A) five (5) screw conveyors that convey ash from the three (3) scrubber-baghouse units to the ash storage silo;

(B) one (1) ash storage silo that batch feeds the fly ash into the dustmaster conditioning system; and

(C) one (1) dustmaster fly ash conditioning system that mixes water and fly ash to produce consistent moisture content that reduces fugitive dust.

(3) Each combustor is equipped with a Liquid Direct Injection (LDI) System, including multiple nozzles for product dispersion. Additional components include two (2) 150,000 gallon mixing tanks and one (1) 10,000 gallon storage tank.

Insignificant Activities:

(a) Lime Silo equipped with a vent fabric filter for particulate control. [326 IAC 6.5]

(b) One (1) dry activated carbon storage silo associated with the Mercury Emissions Control System equipped with an integrated baghouse system with a maximum storage capacity of 3,000 cubic feet. [326 IAC 6.5]

(c) Carbide Lime System, to be constructed in 2014. [326 IAC 6.5]

(e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour. [326 IAC 6.5]

(n) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6.5][326 IAC 6-5]

(q) Emergency equipment: Stationary fire pumps. [326 IAC 6.5]

These units are affected facilities under 40 CFR 63, Subpart ZZZZ.

(t) Vents from ash transport systems not operated at positive pressure. [326 IAC 6.5]

(v) One (1) sand blaster, used for maintenance purposes only, using dust collector as control, constructed in 1988, and exhausting indoors. [326 IAC 6.5]

(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 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the PM emissions from the following facilities shall not exceed 0.03 grains per dry standard cubic foot.

(a) three (3) outlet hoppers for each combustion unit; three (3) surge bins, one for each combustion unit, each equipped with gravimetric feeders for controlling the carbon feed rate to each combustion unit.

(b) three (3) injection trains equipped with pneumatic conveying equipment to transport (blow) the carbon from the feeder to the flue gas duct of each combustion unit.

(c) five (5) screw conveyors that convey ash from the three (3) scrubber-baghouse units to the ash storage silo.

(d) one (1) ash storage silo that batch feeds the fly ash into the dustmaster conditioning system.

(e) one (1) dustmaster fly ash conditioning system that mixes water and fly ash to produce consistent moisture content that reduces fugitive dust.

(f) Lime Silo equipped with a vent fabric filter for particulate control.

(g) One (1) dry activated carbon storage silo associated with the Mercury Emissions Control System equipped with an integrated baghouse system with a maximum storage capacity of 3,000 cubic feet.

(h) Carbide Lime System, to be constructed in 2014.

(i) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(j) Emergency equipment: Stationary fire pumps.

(k) Vents from ash transport systems not operated at positive pressure.

(l) One (1) sand blaster, used for maintenance purposes only, using dust collector as control, constructed in 1988, and exhausting indoors.

D.1.2 Emission Limits [326 IAC 11-7-3]

Pursuant to 326 IAC 11-7-3, the concentration of pollutants contained in the gases discharged to the atmosphere from each of the municipal solid waste combustor units (EU1, EU2, and EU3) shall not exceed the following limits:

(a) Particulate Matter - 25 milligrams per dry standard cubic meter (mg/dscm), corrected to seven percent (7%) oxygen.

(b) Opacity - 10% based on a 6-minute average.

(c) Cadmium - 0.035 milligrams per dry standard cubic meter (mg/dscm) corrected to seven percent (7%) oxygen.

(d) Lead - 0.400 milligrams per dry standard cubic meter (mg/dscm) corrected to seven percent (7%) oxygen.

(e) Mercury - 0.050 milligrams per dry standard cubic meter (mg/dscm); or 15% of the potential mercury emissions concentration corrected to seven percent (7%) oxygen, whichever concentration is less stringent.

(f) Sulfur dioxide - 29 parts per million by volume (ppmv); or 20% of the potential sulfur dioxide emission concentration, whichever concentration is less stringent, corrected to seven percent (7%) oxygen, dry basis, calculated as a 24-hour daily geometric mean.

(g) Hydrogen chloride - 29 parts per million by volume (ppmv); or 5% of the potential hydrogen chloride emissions concentration corrected to seven percent (7%) oxygen, dry basis, whichever is less stringent.

(h) Organic emissions (expressed as total mass dioxins/furans) - 30 nanograms per dry standard cubic meter (ng/dscm) (total mass) corrected to seven percent (7%) oxygen.

(i) Nitrogen oxides - 205 parts per million by volume (ppmv) corrected to seven percent (7%) oxygen, dry basis. Compliance may be based on the average daily NOx emissions.

(j) Carbon monoxide - 100 parts per million by volume (ppmv) measured at the combustor outlet in conjunction with a measurement of oxygen concentration, corrected to seven percent (7%) oxygen, dry basis, calculated as an arithmetic mean (based on a 4-hour block averaging time).

Compliance with the emission limit for nitrogen oxides in D.1.2(i) required under 40 CFR 60.33b(d) shall be determined based on the 24-hour daily arithmetic average of the hourly emission concentrations using continuous emission monitoring system outlet data. Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with procedure 1 in appendix F of 40 CFR 60.

D.1.3 Fugitive Ash Limits [326 IAC 11-7-6]

Pursuant to 326 IAC 11-7-6, the Permittee shall meet the fugitive ash emission standards specified in 40 CFR 60, Subpart Eb, Section 60.55b.

D.1.4 Operating Practices [326 IAC 11-7-4]

Pursuant to 326 IAC 11-7-4, the Permittee shall comply with the following operating practices:

(a) 40 CFR 60, Subpart Eb, Section 60.53b(b)
(b) 40 CFR 60, Subpart Eb, Section 60.53b(c)

D.1.5 Municipal Waste Combustor Operator Training and Certification Requirements [326 IAC 11-7-5]

Pursuant to 326 IAC 11-7-5, the Permittee shall comply with the municipal waste combustor operator training and certification requirements specified in 40 CFR 60, Subpart Eb, Section 60.54b.

D.1.6 Mass Emission Rates

Pursuant to Construction Permit, City of Indianapolis, issued March 25, 1986 and incorporated into Construction Permit PSD (49) 1602, issued April 23, 1986, the total nonmethane hydrocarbon (VOC) mass emission rate from EU1, EU2, and EU3 shall not exceed 3.30 pounds per hour per combustion unit and an annual emission rate of 14.45 tons per twelve (12) consecutive months while combusting only municipal waste.

D.1.7 PSD BACT [326 IAC 2-2]

Pursuant to 326 IAC 2-2-3 (PSD BACT), the Permittee shall comply with the following requirements:

(a) Pursuant to Construction Permit PSD (49) 1602, issued April 23, 1986, nitrogen dioxide mass emission rate shall not exceed 151.2 pounds per hour per combustion unit and an annual emission rate of 662.25 tons per twelve (12) consecutive months while combusting only municipal waste.

(b) Pursuant to Construction Permit PSD (49) 1602, issued April 23, 1986, carbon monoxide mass emission rate shall not exceed 45.4 pounds per hour per combustion unit and an annual emission rate of 198.85 tons per twelve (12) consecutive months while combusting only municipal waste.

(c) Pursuant to Construction Permit PSD (49) 1602, issued April 23, 1986, lead mass emission rate, averaged over a three month period, shall not exceed 2.01 pounds per hour for the three (3) combustion units.

(d) Pursuant to Construction Permit PSD (49) 1602, issued April 23, 1986, mercury mass emission rate, averaged over all 24-hour rolling periods, shall not exceed a mass emission rate of 0.54 pounds per hour for the three (3) combustion units.

D.1.8 Particulate Matter (PM) [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(b)(1)(A), particulate matter emissions from each of the three (3) mass burn waterwall municipal solid waste combustion units (EU1, EU2, and EU3) shall not exceed 0.10 pound of PM per MMBtu heat input.

Pursuant to 326 IAC 6.5-1-1(d), if the above limitations conflict with or are inconsistent with the limitations established in 326 IAC 12, then the more stringent limitations shall apply.

D.1.9 Additional Special Requirements - Consent Decree

If duplicate requirements are found between the incorporated sections of the Consent Decree filed January 12, 1993 and any other conditions of the Part 70 Operating Permit, the Permittee shall comply with the more stringent requirements. There are additional requirements specified from the Consent Decree filed January 12, 1993, Cause number 49F12-9110-OV-2155 that are carried over into the Part 70 Permit. The conditions not carried over from the Consent Decree were either satisfied or were not required by the consent decree to be incorporated into the Part 70 permit. These special requirements of the Consent Decree that are carried over into the Part 70 Permit are not federally enforceable and are as follows:

(a) Operation and Maintenance Plan
Pursuant to the Consent Decree filed January 12, 1993, for Cause number 49F12-9110-OV-2155, Section G, Paragraphs 1 and 5:

(1) Whenever a boiler tube failure, ash plug, broken grate bar, decrease in expected bag performance, or scrubber failure occurs, or a work practice causes any of the foregoing or is demonstrated to adversely impact the Facility's ability to meet the terms and conditions of the Permit, the Permittee shall reevaluate the applicable provisions of its O & M Plan required in D.1.9(a)(2) to determine if any changes in such provisions, including work practices, are required, and shall report to IDEM the results of the reevaluations noted below. The Permittee shall notify IDEM, OAQ and OES, in writing within thirty (30) days prior to implementing revisions to the O & M Plan.

(2) The Permittee shall combine all current operation and preventative maintenance plans, including the Baghouse/Scrubber Preventive Maintenance Plan, Boiler Operation and Maintenance Plan and the Maintenance Management System, into one plan to be described as the Operation and Maintenance Plan (O & M Plan), containing sections on (1) Maintenance Management System, (2) Auxiliary Burner, (3) Martin Stoker/Ash Discharger, (4) Waste Feed, (5) Boiler, and (6) Baghouse/Scrubber. Each section shall describe the applicable work practices to assure the proper operation of the applicable equipment and systems which may impact air emissions from the Facility and shall describe or reference related work orders for such equipment and systems included in the Prefix or equivalent system described in the Maintenance Management System section of the O & M Plan.

(b) Sulfur Dioxide
Pursuant to Consent Decree filed January 12, 1993, Cause number 49F12-9110-OV-2155, Section D, Paragraph 1, the Permittee shall keep the acid gas scrubber for each combustor in service whenever municipal solid waste is on the grate for that unit.

(c) Substantive Provisions

(1) Baghouse
Pursuant to Consent Decree Section B, Paragraph 2, Cause number 49F12-9110-OV-2155, the Permittee shall not bypass the baghouse for a Unit while municipal solid waste is on the grate unless necessary to avoid an explosive or other dangerous situation which could result in structural or major damage to any equipment of the Facility impairing the use of such equipment, or injury to personnel working at or near the Facility. Structural or major damage to any equipment of the Facility does not include damage to or destruction of bags. The Permittee shall bear the burden of demonstrating the need for the bypass. Within ten (10) days of a bypass incident, the Permittee shall submit a written report to the OES and IDEM detailing the length of the bypass incident, the operating parameters at the time of the bypass, including but not limited to flue gas inlet temperature to the baghouse and differential pressure across the baghouse, and the conditions or reasons necessitating the bypass.

(2) Good Combustion Practices
Pursuant to Consent Decree Section B, Paragraph 3 Cause number 49F12-9110-OV-2155, because the furnace boiler tube thinning may be attributable to fireside corrosion stemming from acid gases and corrosive salts, providing a catalyst for boiler tube failure, Covanta Indianapolis, Inc. shall, within thirty (30) days after the effective date of this Consent Decree, conduct a review of the boiler operation to determine the optimum operation to reduce boiler tube thinning and to establish procedure to ensure that the optimum boiler operation can be consistently maintained. The following will be addressed in such review:

(A) Training
Operating personnel have increased the number of furnace observations made at regularly scheduled intervals, as part of their normal “walk-downs”. In addition, an operator/shift supervisor training program, geared toward optimum combustion control and stoker operation, will continue to be implemented.

D.1.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any 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.1.11 Compliance and Performance Testing [326 IAC 11-7-7]

Pursuant to 326 IAC 11-7-7, the Permittee shall comply with the following:

(a) Compliance and performance testing methods and procedures specified in 40 CFR 60, Subpart Eb, Section 60.58b, except as provided in subsections (b) through (c). All tests shall meet the requirements of 326 IAC 3-6.

(b) If all of the dioxin/furan compliance tests for all designated facilities over a two (2) year period indicate that the dioxin/furan emissions are less than or equal to fifteen (15) nanograms per dry standard cubic meter corrected to seven percent (7%) oxygen, the owner or operator of the plant may elect to conduct an annual dioxin/furan performance test for one (1) designated facility (unit) per year at the plant. At a minimum, a performance test for dioxin/furan emissions shall be conducted annually (no more than twelve (12) months following the previous performance test) for one (1) designated facility

at the plant. Each year a different designated facility shall be tested. The designated facilities at the plant shall be tested in sequence, such as Unit 1 the first year, followed by Unit 2 the next year.

(c) If an annual performance test indicates an emission level for dioxin/furan greater than fifteen (15) nanograms per dry standard cubic meter corrected to seven percent (7%) oxygen, then performance tests shall be conducted annually on all designated facilities at the plant until all annual performance tests for all designated facilities at the plant over a two (2) year period indicate a dioxin and furan emission level less than or equal to fifteen (15) nanograms per dry standard cubic meter corrected to seven percent (7%) oxygen.

(d) The owner or operator of a designated facility who elects to follow the performance testing schedule specified in subsection (b) shall follow the procedures specified in 40 CFR 60, Subpart Eb, Section 60.59b(g)(4), for reporting the election of this schedule to the department.

D.1.12 Operation of Equipment [326 IAC 2-7-6(6)]

The Permittee shall comply with the following requirements for each of the municipal solid waste combustor units (EU1, EU2, and EU3):

(a) Based on data from the nitrogen oxides continuous emission monitoring systems (CEMS) for each of the municipal waste combustors, the selective noncatalytic reduction (SNCR) system for NOx control shall be in operation and control emissions from the municipal waste combustors as necessary in order to comply with Condition D.1.2(i).

(b) In order to comply with Conditions D.1.2(f) and D.1.2(g), and pursuant to Installation Permit, issued March 25, 1986 and Operation Permit, issued May 12, 1989, the Permittee shall operate the spray dryer absorber and the fabric filter prior to charging any MSW, during continuous combustion of MSW, and during shutdown until all MSW remaining on the grate is combusted.

(c) Pursuant to Installation Permit, issued March 25, 1986 and Operation Permit, issued May 12, 1989, the Permittee shall operate continuous monitoring equipment for sulfur dioxide, oxygen, and carbon monoxide at the economizer outlet, and sulfur dioxide and opacity at the fabric filter outlet.

(d) Pursuant to Installation Permit, issued March 25, 1986 and Operation Permit, issued May 12, 1989, primary combustion air shall be drawn from the tipping floor maintaining a negative air pressure in the building containing the tipping floor and receiving pit.

(e) In order to comply with Conditions D.1.2(a) through D.1.2(d), D.1.8, the fabric filter for particulate matter, opacity, cadmium, and lead control shall be in operation and control emissions from the municipal waste combustors at all times when the facility is in operation.

D.1.13 Mercury Emissions Control System [326 IAC 2-7-6(6)]

Based on stack test data and municipal waste data for each of the municipal waste combustors, the carbon injection system for mercury control shall be in operation and control emissions from the municipal waste combustors as necessary in order to comply with Condition D.1.2(e).

D.1.14 Testing Requirements [326 IAC 2-1.1-11]

To demonstrate compliance with Condition D.1.2 (326 IAC 11-7-3), Condition D.1.8 (326 IAC 6.5-1), and Condition E.1.2 (40 CFR 60, Subpart Cb), the Permittee shall perform PM, opacity, Cadmium, Lead, Mercury, Dioxin/Furan, and HCl testing as required by 40 CFR 60, Subpart Cb, and 326 IAC 11-7, and as specified in Condition D.1.11.

D.1.15 Continuous Opacity Monitoring [326 IAC 3-5] [326 IAC 2-7-6(1),(6)] [40 CFR 60 Subpart Cb]

(a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous monitoring systems for the municipal waste combustors shall be calibrated, maintained, and operated for measuring opacity at the fabric filter outlet, which meet all applicable performance specifications of 326 IAC 3-5-2.

(b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.

(c) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60 Subpart Cb.

D.1.16 Continuous Emission Monitoring [326 IAC 3-5] [326 IAC 2-7-6(1),(6)] [40 CFR 60 Subpart Cb]

(a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous emission monitoring systems for the municipal waste combustors shall be calibrated, maintained, and operated for measuring sulfur dioxide, nitrogen oxides, carbon monoxide, and oxygen at the economizer outlet and sulfur dioxide at the fabric filter outlet, which meet all applicable performance specifications of 326 IAC 3-5-2.

(b) All continuous emissions monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.

(c) Nothing in this condition shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60 Subpart Cb.

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

D.1.17 Continuous Opacity Monitoring (COMS) Downtime

(a) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(b) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.

(1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.

(2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.

(3) Method 9 readings may be discontinued once a COMS is online.

(4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.

D.1.18 Continuous Emissions Monitoring (CEMS) Equipment Downtime

(a) In the event that a breakdown of a sulfur dioxide, nitrogen oxides, carbon monoxide, or oxygen continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(b) Whenever a sulfur dioxide, nitrogen oxides, carbon monoxide, or oxygen continuous emission monitor is malfunctioning or is down for calibration, maintenance, or repairs for a period of four (4) hours or more, supplemental or intermittent monitoring of the parameter shall be implemented as specified below until such time as the emission monitor system is back in operation.

(1) In the event that a sulfur dioxide CEMS is down, the Permittee shall maintain slurry feed rate at which it was being fed prior to the CEMS going down and will record the slurry feed rate four (4) times an hour.

(2) In the event that a nitrogen oxides CEMS is down, the Permittee shall maintain ammonia feed at the rate at which it was being fed prior to the CEMS going down and will record the ammonia feed rate four (4) times an hour.

(3) In the event that a carbon monoxide CEMS is down, the Permittee shall monitor the oxygen percent four (4) times an hour and maintain the oxygen percent range from 5 to 11 percent. In addition, the four (4) hour average of the municipal waste combustor rooftop thermocouple temperatures must remain greater than or equal to 1155°F, except during combustor startup, shutdown, or malfunction.

(4) In the event that a oxygen monitor failure, the second oxygen monitor located at the stack outlet will be used as the backup analyzer immediately.

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

D.1.19 Record Keeping Requirements for Consent Decree

(a) Pursuant to Consent Decree filed January 12, 1993, Cause number 49F12-9110-OV-2155, Section F paragraphs 1 through 5 and paragraph 9:

(1) The Permittee shall submit the following information to both IDEM and the OES in a monthly report:

(A) All permit exceedances

(B) Unit downtime as defined by 40 CFR 60, Subpart Cb

(C) CEMs downtime as defined by 40 CFR 60, Subpart Cb

(D) Highest outlet SO_2 concentration

(E) Highest outlet CO concentration

(F) Average feedwater flow rate, per unit (klb/day)

(G) Total export steam output (klb/day)

(H) Material charged, per unit (ton/day)

(2) In addition to the monthly report, for each instance of an exceedance of an emission limit in the Permits, the Permittee shall submit to IDEM and the OES, the following:

(A) Monitoring data (raw, corrected and averaged values) for that pollutant and all other monitored pollutants and for flue gas temperature at the baghouse inlet, the time the use of natural gas in a Unit commenced and ended, steam flow, and oxygen extending before and after the exceedance for a period equal to the hours of averaging time for the particular pollutant; and

(B) Documentation indicating the hours when garbage was on the grate during the period of the exceedance, the causes of all emissions which occurred during the exceedance and the causes of all emissions which occurred during the exceedance and the actions taken to correct said excess emissions. Upon request, the Permittee shall submit to IDEM or the OES, as soon as practicable, any other data or information which is relevant to the exceedance.

(3) The Permittee shall submit a quarterly summary of SO_2 (lb/day) and CO (lb/day).

(4) The Permittee also shall submit Quarterly Quality Assurance Reports in accordance with 40 CFR 60, Part F, Section 5 and with the following instructions:

(A) Opacity

(i) Results of the quarter QA checks

(AA) optical alignment

(BB) manual calibration and zero checks

(ii) Results for all performance tests, audits, and recalibrations performed during the quarter.

(iii) Reference to, and where applicable for data validity purposes, control charts of zero and span drift.

(iv) Reference to, and where applicable for data validity purposes, a listing of repairs, adjustments, or maintenance of monitors.

(v) The cause and time period for bad data and for suspect data averages. (Format as in Part III)

(vi) The percent valid data return (VDR)

(B) Gaseous - the data assessment report (DAR) must contain the following information:

(i) Identification and location of monitors.

(ii) Manufacturer and model number of each monitor

(iii) Assessment of continuous monitors data accuracy and data of assessment as determined by a RATA, RAA or CGA described in Section 5 of 40 CFR 60 Appendix F including the RA for the RATA, the A for the RAA or CGA, the RM results, the cylinder gases certified values, the CEMS responses accuracy, and calculations results as defined in Section 6 of 40 CFR 60 Appendix F.

(5) The Permittee shall report to IDEM malfunctions of any facility or emission control equipment in accordance with 326 IAC 1-6-2 and malfunctions of any monitoring system in accordance with 326 IAC 3-5. Claims that exceedances due to malfunctions are not violations shall be made pursuant to 326 IAC 1-6-4, shall be made in writing and shall be meet the definition under 326 IAC 1-2-39. The Permittee also shall report all malfunctions to the OES in accordance with the applicable regulations adopted by the OES and in effect at the time.

Compliance with Section B.11 - Emergency Provisions will satisfy the requirement of Condition D.1.9(d)(5).

(6) All data derived from the continuous emissions monitors and temperature monitors (other than the data submitted pursuant to paragraph 9 below) which the Permittee submits in a written report format to IDEM and the OES shall be quality assured pursuant to the approved quality assurance/quality control plan referenced in paragraph 8***** below and attested as to its accuracy by the Facility and/or General Manager or Chief Engineer. All additional data which the Permittee submits in a written report format to IDEM and the OES shall be attested as to its accuracy by the Facility and/or General Manager or Chief Engineer.

Pursuant to Section B.8 - Certification and the Part 70 permit program, certification requirements for each submission are identified in the permit. General certification requirements are contained in Section B.8 - Certification.

(7) The Permittee shall submit the monthly report required by paragraph (1) above within fifteen (15) days from the last day of the reporting period provided however that if the report is due on a weekend or holiday, it shall be due on the following business day.

(8) The Permittee shall designate in writing to IDEM and the OES the name of an employee at the Facility and a back up employee, at the Facility to act in the absence of the designated employee, to serve as a person who will provide IDEM with all requested information and data. The Permittee may designate a new or different employee at any time by providing written notice thereof to IDEM and the OES.

(9) The Permittee shall transfer daily to IDEM and the OES via modems and compatible computer hardware owned, operated and maintained by IDEM and OES respectively, the Facility's continuously monitored raw data for the prior calendar day for all regulated pollutants, temperature, steam flow, carbon dioxide and oxygen. The Permittee shall obtain authorization from its software licensor to allow IDEM and OES to use the software necessary for IDEM and OES to collect and analyze the data and produce reports in the same format as the reports generated by the Permittee and submitted to IDEM and OES. The Permittee further agrees it will provide one day of training for the employees of IDEM and OES with respect to such software.

or

The Permittee alternatively shall give complete electronic access to IDEM and OES via computer connection at any time. The connection shall give IDEM and OES access to all monitoring data. This alternative requirement satisfies Condition D.1.9(d)(9).

The Consent Decree filed January 12, 1993, uses the word "Facility" to describe the source. "Facility" is sometimes interpreted as an individual emission unit or process, however in this case IDEM believes that the word "Facility" is synonymous with the word "Source"; therefore, any requirements of the "Facility" are requirements for the entire "Source", not requirements of an individual emission unit or process.

*Paragraph 8 is in reference to paragraph 8 of the Consent Decree and not paragraph (8) listed above.

D.1.20 Record Keeping Requirements for COMS [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 3-5]

(a) To document the compliance status with Section C - Opacity, D.1.2(b), and D.1.17, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits in Section C - Opacity and D.1.2(b).

(1) Data and results from the most recent stack test.

(2) All continuous opacity monitoring data, pursuant to 326 IAC 3-5-6.

(3) The results of all Method 9 visible emission readings taken during any periods of COMS downtime.

(4) All fabric filter parametric monitoring readings.

(b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.1.21 Record Keeping Requirements for CEMS [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 3-5]

(a) The Permittee shall record the output of the continuous monitoring systems and shall perform the required record keeping pursuant to 326 IAC 3-5-6 and 326 IAC 3-5-7.

(b) In order to document the compliance status with Condition D.1.12(a), the Permittee shall maintain continuous records of operation for each of the selective noncatalytic reduction (SNCR) systems associated with the municipal waste combustors. The Permittee shall include in its records when any one or more of the SNCR systems were not in operation and the supporting continuous emission monitoring system (CEMS) data used in determining that operation of the SNCR was not necessary.

(c) In order to document the compliance status with Condition D.1.13, the Permittee shall maintain daily records of operation for each of the carbon injection systems associated with the municipal waste combustors. The Permittee shall include in its daily records when any one or more of the carbon injection systems were not in operation and the supporting stack test data and/or municipal waste data used in determining that operation of the carbon injection systems was not necessary that day.

(d) In order to document the compliance status with Condition D.1.18(a), in the event that a breakdown of the sulfur dioxide, nitrogen oxides, carbon monoxide, or oxygen continuous emission monitoring systems (CEMS) occurs, the Permittee shall maintain records of all CEMS malfunctions, out of control periods, calibration and adjustment activities, and repair or maintenance activities.

(e) In order to document the compliance status with Condition D.1.18(b), whenever a sulfur dioxide, nitrogen oxides, carbon monoxide, or oxygen continuous emission monitor is malfunctioning or is down for calibration, maintenance, or repairs for a period of four (4) hours or more, the Permittee shall maintain the following records:

(1) In the event that a sulfur dioxide CEMS is down, the Permittee shall maintain slurry feed rate records pursuant to Condition D.1.18(b).

(2) In the event that a nitrogen oxides CEMS is down, the Permittee shall maintain ammonia feed records pursuant to Condition D.1.18(b).

(3) In the event that a carbon monoxide CEMS is down, the Permittee shall maintain oxygen records and waste combustor rooftop thermocouple temperature records pursuant to Condition D.1.18(b).

(4) In the event that a oxygen monitor failure, the Permittee shall maintain oxygen records using the second oxygen monitor pursuant to Condition D.1.18(b).

(f) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.1.22 Reporting Requirements

A quarterly report of opacity exceedances shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(35).

D.1.23 Reporting Requirements for CEMS [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 3-5]

(a) The Permittee shall prepare and submit to IDEM, OAQ a written report of the results of the calibration gas audits and relative accuracy test audits for each calendar quarter within thirty (30) calendar days after the end of each quarter. The report must contain the information required by 326 IAC 3-5-5(e)(2).

The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(35).

(b) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:

(1) date of downtime;

(2) time of commencement;

(3) duration of each downtime;

(4) reasons for each downtime; and

(5) nature of system repairs and adjustments.

The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) Advanced Recycling Center (ARC) for recovering ferrous and non-ferrous metals, paper, corrugated cardboard, and plastics from a portion of the incoming municipal solid waste (MSW) stream, identified as Unit 004, approved in 2015 for construction, with a design capacity of 50 tons per hour, consisting of the following equipment:

(1) One (1) MSW Delivery Point at the western entrance to the site using the existing four (4) automated truck scales to provide an accounting of the waste delivered to and the recyclables and residue removed from the ARC, with no controls and vented to the outdoors through the general building ventilation system;

(2) One (1) Enclosed MSW Storage Area with overhead doors and a tipping floor having a maximum storage capacity of approximately 735 tons of MSW, with no controls and vented to the outdoors through the general building ventilation system;

(3) One (1) Pre-Sort Area, with no controls and vented to the outdoors through the general building ventilation system, where waste received at the tipping floor is presorted into the following parts:

(A) Old Corrugated Cardboard;

(B) Large Items; and

(C) Propane Tanks and Large Metals.

(4) One (1) Bag Opener/Size Reducer to open returned bags of waste and process feed from the Pre-Sort Area, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(5) One (1) Overbelt Magnet to recover ferrous metal from the processed waste stream, with no controls and vented to the outdoors through the general building ventilation system;

(6) One (1) Trommel (No.2) for size classification with large items returned to the Pre-Sort Area for reprocessing or removal from the process, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(7) One (1) Trommel (No. 110) for further size classification, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(8) One (1) Walair Separator (No. 470) which separates Medium/Heavy and Light Density materials from the Trommel No. 110 overs stream, controlled by a baghouse, identified as CE6, and exhausting to the outdoors;

(9) One (1) Star Screen to size sort materials from the Trommel No. 110 unders stream, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(10) One (1) Walair Separator (No. 250) which separates Medium/Heavy and Light Density materials from the Star Screen overs stream, controlled by a baghouse, identified as CE5, and exhausting to the outdoors;

(11) Two (2) Ballistic Separators (No. 800 and No. 630) to process the Medium/Heavy materials separated by the Walair Separators, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(12) One (1) Eddy Current Separator to recover non-ferrous metals from the materials sorted by the Ballistic Separators and the Star Screen, with no controls and vented to the outdoors through the general building ventilation system;

(13) One (1) Fines Star Screen to process non-ferrous materials from the Ballistic Separators and the Eddy Current Separator, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(14) Twelve (12) Titech Optical Sorters to sort and recover small mixed paper, large mixed paper, OCC, plastic, polyethylene terephthalate, high-density polyethylene, polypropylene from non-recyclable waste material, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(15) One (1) Baler and Bale Storage Area located in the western end of the ARC for packaging and storage of recyclables prior to shipment to markets, controlled by a baghouse, identified as CE4;

(16) Ten (10) conveyor belt transfer points, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(17) One (1) Recyclables Loadout Area located in the northwestern corner of the ARC and consisting of a flush loading dock design with four (4) truck bays equipped with roll-up doors, with no controls and vented to the outdoors through the general building ventilation system;

(18) One (1) Remaining MSW Exit Point consisting of an enclosed, inclined conveyor for the transport of the remaining MSW from the ARC to a single gravity-fed chute located in the northwestern corner of the tipping floor of the adjacent Indianapolis Resource Recovery Facility, with no controls and vented to the outdoors through the general building ventilation system and used as combustion air within the Indianapolis Resource Recovery Facility; and

(19) One (1) Fines Loadout Area located at the southern interior wall of the proposed ARC and consisting of two (2) truck bays where fines, including dirt, broken glass and small pieces of paper, which have been conveyed into 40 cubic yard containers within the ARC, will be loaded onto trucks for disposal at a licensed landfill, controlled by a baghouse, identified as CE4, and exhausting to the outdoors.

Insignificant Activities:

(n) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6.5][326 IAC 6-5]

(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 PSD Minor Particulate Limitations [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable for PM, PM10, and PM2.5, the Permittee shall comply with the following:

(a) PM, PM10, and PM2.5 emissions from the following emission units shall not exceed the emission limits specified in the table below:

Emission Units	Control Device	PM Limit (lbs/hr)	PM10 Limit (lbs/hr)	PM2.5 Limit (lbs/hr)
Bag Opener/Size Reducer	Baghouse CE4	1.853	1.853	1.853
Trommel (No.2)				
Trommel (No. 110)				
Star Screen				
Ballistic Separators (No. 800 and No. 630)				
Fines Star Screen				
Twelve (12) Titech Optical Sorters				
Baler and Bale Storage Area				
Ten (10) conveyor belt transfer points				
Fines Loadout Area				
Walair Separator (No. 250)	Baghouse CE5	0.094	0.094	0.094
Walair Separator (No. 470)	Baghouse CE6	0.139	0.139	0.139

(b) The Advanced Recycling Center (ARC) shall not exceed 7,280 hours of operation per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) Fugitive PM, PM10, and PM2.5 emissions from paved roads and parking lots associated with the "Advanced Recycling Center" (ARC) shall be controlled by the following methods:

(1) Except during periods of inclement weather, roadways and other paved areas throughout the facility site shall be daily cleaned with a mechanical sweeper. Particular attention shall be paid to the entrance and the exit roadways at the ash handling building. Mechanical sweeping shall also be focused on what will be a high traffic area between the "Energy-from-Waste" (EfW) facility and the "Advanced Recycling Center" (ARC).

(2) Manual sweeping and vacuuming, if necessary, of any localized spills of solid material shall be conducted to minimize buildup of material on facility roadways.

(3) As a means of dust control, all doors to the ARC shall be kept closed except when the doors are being used.

Compliance with these limits will limit the potential to emit from Significant Source Modification No. 097-35573-00123 to less than twenty-five (25) tons of PM per twelve (12) consecutive month period, less than fifteen (15) tons of PM_{10} per twelve (12) consecutive month period, and less than ten (10) tons of $PM_{2.5}$ per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification.

D.2.2 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6-5.1-2(a), particulate matter (PM) emissions from each of the Advanced Recycling Center (ARC) emission units and the paved roads and parking lots associated with the "Advanced Recycling Center" (ARC) shall not exceed 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for each of the Advanced Recycling Center (ARC) emission units and any associated 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.2.4 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to ensure compliance with Conditions D.2.1(a) and D.2.2, Baghouses CE4, CE5, and CE6 shall be in operation and controlling emissions at all times the ARC is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

Not later than 180 days after the startup of the ARC, in order to demonstrate compliance with Conditions D.2.1(a) and D.2.2, the Permittee shall perform PM, PM10, and PM2.5 testing of the ARC Baghouse 1, identified as CE4, utilizing methods approved by the commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

D.2.6 Visible Emission Notations

(a) Daily visible emission notations of the stack exhaust of ARC Baghouse 1, identified as CE4, shall be performed during normal daylight operations, when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C- Response to Excursions and Exceedances contains the Permittee's obligation 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.2.7 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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 has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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 baghouse's 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.2.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.1(b), the Permittee shall maintain records of the hours of operation of the ARC.

(b) To document the compliance status with Condition D.2.1(c), the Permittee shall maintain records of the date, approximate time, and type of each fugitive dust control measure used (e.g., mechanical sweeping, vacuuming, keeping the ARC doors closed except when the doors are being used).

(c) To document the compliance status with Condition D.2.6(a), the Permittee shall maintain daily records of the visible emission notations of each stack exhaust from the ARC Baghouse 1, identified as CE4. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (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 record keeping required by this condition.

D.2.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.1(b) shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Three (3) mass burn waterwall municipal solid waste combustion units, constructed in 1988, identified as EU1, EU2, and EU3. Each unit is capable of burning municipal solid waste at a rate of 726 tons per day at 5500 Btu/lb. Each Combustor unit is equipped with two (2) 140 MMBtu per hour natural gas-fired burners used for start-up, shutdown, and flame stabilization.

(1) The flue gas from each combustion unit is controlled by:

(A) a spray dryer absorber with hydrated lime slurry controlling acid gas, identified as CE1A, CE2A, and CE3A;

(B) fabric filter bags controlling particulates, identified as CE1B, CE2B, and CE3B in parallel; exhausting to stack vents SV1, SV2, and SV3, with CEMS for NO_x, CO, SO_2, O_2 and a COM for opacity;

(C) a Mercury Emissions Control System comprised of:

(i) three (3) outlet hoppers for each combustion unit; three (3) surge bins, one for each combustion unit, each equipped with gravimetric feeders for controlling the carbon feed rate to each combustion unit; and

(ii) three (3) injection trains equipped with pneumatic conveying equipment to transport (blow) the carbon from the feeder to the flue gas duct of each combustion unit.

(D) a Nitrogen Oxide Emission Control System utilizing one (1) selective non catalytic reduction (SNCR) system comprised of:

(i) one (1) 20,000 gallon, aqueous ammonia storage tank;

(ii) two (2) ammonia feed pumps to supply ammonia from the storage tank to the injection nozzle system; and

(iii) three (3) injection nozzle systems equipped with carrier blowers.

(2) A Fugitive Ash Emission Control System utilizing one (1) dustmaster fly ash conditioning system comprised of:

(A) five (5) screw conveyors that convey ash from the three (3) scrubber-baghouse units to the ash storage silo;

(B) one (1) ash storage silo that batch feeds the fly ash into the dustmaster conditioning system; and

(C) one (1) dustmaster fly ash conditioning system that mixes water and fly ash to produce consistent moisture content that reduces fugitive dust.

(3) Each combustor is equipped with a Liquid Direct Injection (LDI) System, including multiple nozzles for product dispersion. Additional components include two (2) 150,000 gallon mixing tanks and one (1) 10,000 gallon storage tank.

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

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

E.1.1 General Provisions Relating to New Source Performance Standards (NSPS) for Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors that are Constructed on or Before September 20, 1994 [326 IAC 12-1][40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60.30b, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, and apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Cb and (as referenced within Subpart Cb) specific provisions of Subpart Eb, for the three (3) mass burn waterwall municipal solid waste combustion units, identified as EU1, EU2, and EU3.

E.1.2 New Source Performance Standards (NSPS) for Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors that are Constructed on or Before September 20, 1994 [40 CFR Part 60, Subpart Cb][326 IAC 12]

The Permittee which operates a large municipal waste combustor shall comply with the following provisions of 40 CFR Part 60, Subpart Cb (included as Attachment A of this permit), which are incorporated by reference as 326 IAC 12, for the three (3) mass burn waterwall municipal solid waste combustion units, identified as EU1, EU2, and EU3:

(1) 40 CFR 60.33b (a)(1)(i)
(2) 40 CFR 60.33b (a)(1)(iii)
(3) 40 CFR 60.33b (a)(2)(i)
(4) 40 CFR 60.33b (a)(3)
(5) 40 CFR 60.33b (a)(4)
(6) 40 CFR 60.33b (b)(1)(i)
(7) 40 CFR 60.33b (b)(3)(i)
(8) 40 CFR 60.33b (b)(3)(ii)
(9) 40 CFR 60.33b (c)(1)(iii)
(10) 40 CFR Part 60, Subpart Cb Table 1
(11) 40 CFR Part 60, Subpart Cb Table 3
(12) 40 CFR 60.34b (b) [Incorporates by reference 40 CFR 60.53b (b) and (c)]
(13) 40 CFR 60.35b [Incorporates by reference 40 CFR 60.54b]
(14) 40 CFR 60.36b [Incorporates by reference 40 CFR 60.55b]
(15) 40 CFR 60.38b [Incorporates by reference 40 CFR 60.58b]
(16) 40 CFR 60.39b [Incorporates by reference 40 CFR 60.59b]

The Permittee may request an extension of a deadline to conduct testing as provided by 40 CFR §§ 60.8, 61.13 or 63.7.

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Specifically Regulated Insignificant Activities:

(q) Emergency equipment: Stationary fire pumps.

These units are affected facilities under 40 CFR 63, Subpart ZZZZ.

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

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

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.6665, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, as specified in Table 8 of 40 CFR Part 63, Subpart ZZZZ in accordance with schedule in 40 CFR 63 Subpart ZZZZ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.2.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B of this permit), which are incorporated by reference as 326 IAC 20-82, for the one (1) emergency stationary fire pump:

(1) 40 CFR 63.6585
(2) 40 CFR 63.6590(a)(1)(ii) and (c)(6)
(3) 40 CFR 63.6595(a)
(4) 40 CFR 63.6602
(5) 40 CFR 63.6605
(6) 40 CFR 63.6645(a)(5)

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

PART 70 QUARTERLY REPORT

Source Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-32931-00123
Facility: Advanced Recycling Center (ARC)
Parameter: Hours of Operation
Limits: The Advanced Recycling Center (ARC) shall not exceed 7,280 hours of operation per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:_____ YEAR:_____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone:_____

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

Source Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-32931-00123

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: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-32931-00123

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_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone:_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-32931-00123

Months: _____ to _____ Year: _____

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Attachment C

Part 70 Operating Permit No: T097-32931-00123

Fugitive Dust Control Plan

Fugitive particulate matter emissions from paved roads and parking lots shall be controlled by the following methods:

1. Except during periods of inclement weather, roadways and other paved areas throughout the facility site shall be daily cleaned with a mechanical sweeper. Particular attention shall be paid to the entrance and the exit roadways at the ash handling building. Mechanical sweeping shall also be focused on what will be a high traffic area between the "Energy-from-Waste" (EfW) facility and the "Advanced Recycling Center" (ARC).

2. Manual sweeping and vacuuming, if necessary, of any localized spills of solid material shall be conducted to minimize buildup of material on facility roadways.

3. Dust control in the main building of the EfW facility shall be achieved by drawing boiler combustion air from tipping floor area. The combustion air fans inlet ducts are located near the refuse pit roof, in the area above the refuse hoppers. This allows air-borne dust to be carried into the combustion process along with combustion air and gas system.

4. As a means of dust control, all doors to the ARC shall be kept closed except when the doors are being used.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source / Significant Permit Modification

Source Description and Location

Source Name:	Covanta Indianapolis, Inc.
Source Location:	2320 S. Harding Street, Indianapolis, IN 46221
County:	Marion (Center Township)
SIC Code:	4953
Operation Permit No.:	T097-32931-00123
Operation Permit Issuance Date:	September 19, 2014
Significant Source Modification No.:	097-35573-00123
Significant Permit Modification No.:	097-35639-00123
Permit Reviewer:	Jenny Liljegren/David Matousek

Existing Approvals

The source was issued Part 70 Operating Permit No. T097-32931-00123 on September 19, 2014. The source has since received the following approvals:

(a) Review Request No. 097-35073-00123, issued on November 5, 2014.

County Attainment Status

The source is located in Marion County (Center Township).

Pollutant	Designation
SO_2	Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Attainment effective July 11, 2013, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Marion County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) SO_2
U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, has designated Marion County, Center Township as nonattainment for SO_2. Therefore, SO_2 emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(d) Other Criteria Pollutants
Marion 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 source is classified as a municipal incinerator, or combination of municipal incinerators, capable of charging more than fifty (50) tons of refuse per day. it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Source Status - Existing Source

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:

Pollutant	**Emissions** (ton/yr)
PM	39.60
PM_{10}	> 100
$PM_{2.5}$	> 100
SO_2	222.50
NO_X	< 662.62
VOC	< 14.56
CO	< 199.15
HAPs	28.74
Worst Single HAP	20.99 (Hydrochloric Acid)

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, excluding GHGs, is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3), because SO_2, a nonattainment regulated pollutant, is emitted at a rate of 100 tons per year or more.

(c) These emissions are based upon the Technical Support Document to Operation Permit No. T097-32931-00123.

(d) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and 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).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Covanta Indianapolis, Inc. on March 10, 2015, relating to the construction of an advanced recycling center (ARC). The following is a list of the proposed emission units and pollution control device(s):

A.2(b) One (1) Advanced Recycling Center (ARC) for recovering ferrous and non-ferrous metals, paper, corrugated cardboard, and plastics from a portion of the incoming municipal solid waste (MSW) stream, identified as Unit 004, approved in 2015 for construction, with a design capacity of 50 tons per hour, consisting of the following equipment:

(1) One (1) MSW Delivery Point at the western entrance to the site using the existing four (4) automated truck scales to provide an accounting of the waste delivered to and the recyclables and residue removed from the ARC, with no controls and vented to the outdoors through the general building ventilation system;

(2) One (1) Enclosed MSW Storage Area with overhead doors and a tipping floor having a maximum storage capacity of approximately 735 tons of MSW, with no controls and vented to the outdoors through the general building ventilation system;

(3) One (1) Pre-Sort Area, with no controls and vented to the outdoors through the general building ventilation system, where waste received at the tipping floor is presorted into the following parts:

(A) Old Corrugated Cardboard;
(B) Large Items; and
(C) Propane Tanks and Large Metals.

(4) One (1) Bag Opener/Size Reducer to open returned bags of waste and process feed from the Pre-Sort Area, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(5) One (1) Overbelt Magnet to recover ferrous metal from the processed waste stream, with no controls and vented to the outdoors through the general building ventilation system;

(6) One (1) Trommel (No.2) for size classification with large items returned to the Pre-Sort Area for reprocessing or removal from the process, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(7) One (1) Trommel (No. 110) for further size classification, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(8) One (1) Walair Separator (No. 470) which separates Medium/Heavy and Light Density materials from the Trommel No. 110 overs stream, controlled by a baghouse, identified as CE6, and exhausting to the outdoors;

(9) One (1) Star Screen to size sort materials from the Trommel No. 110 unders stream, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(10) One (1) Walair Separator (No. 250) which separates Medium/Heavy and Light Density materials from the Star Screen overs stream, controlled by a baghouse, identified as CE5, and exhausting to the outdoors;

(11) Two (2) Ballistic Separators (No. 800 and No. 630) to process the Medium/Heavy materials separated by the Walair Separators, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(12) One (1) Eddy Current Separator to recover non-ferrous metals from the materials sorted by the Ballistic Separators and the Star Screen, with no controls and vented to the outdoors through the general building ventilation system;

(13) One (1) Fines Star Screen to process non-ferrous materials from the Ballistic Separators and the Eddy Current Separator, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(14) Twelve (12) Titech Optical Sorters to sort and recover small mixed paper, large mixed paper, OCC, plastic, polyethylene terephthalate, high-density polyethylene, polypropylene from non-recyclable waste material, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(15) One (1) Baler and Bale Storage Area located in the western end of the ARC for packaging and storage of recyclables prior to shipment to markets, controlled by a baghouse, identified as CE4;

(16) Ten (10) conveyor belt transfer points, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(17) One (1) Recyclables Loadout Area located in the northwestern corner of the ARC and consisting of a flush loading dock design with four (4) truck bays equipped with roll-up doors, with no controls and vented to the outdoors through the general building ventilation system;

(18) One (1) Remaining MSW Exit Point consisting of an enclosed, inclined conveyor for the transport of the remaining MSW from the ARC to a single gravity-fed chute located in the northwestern corner of the tipping floor of the adjacent Indianapolis Resource Recovery Facility, with no controls and vented to the outdoors through the general building ventilation system and used as combustion air within the Indianapolis Resource Recovery Facility; and

(19) One (1) Fines Loadout Area located at the southern interior wall of the proposed ARC and consisting of two (2) truck bays where fines, including dirt, broken glass and small pieces of paper, which have been conveyed into 40 cubic yard containers within the ARC, will be loaded onto trucks for disposal at a licensed landfill, controlled by a baghouse, identified as CE4, and exhausting to the outdoors.

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.

Note: In addition to the emissions associated with Advanced Recycling Center (ARC), fugitive dust emissions from vehicle traffic on paved road associated with the existing municipal solid waste combustion facility are being calculated and included in the potential to emit of the entire source. These fugitive dust emissions are not considered part of the Advanced Recycling Center (ARC) modification. Paved and unpaved roads and parking lots with public access were permitted for the existing municipal solid waste combustion facility as part of the original Part 70 Pemit No. T097-5985-00123, issued March 6, 2003, the First Part 70 Permit Renewal No. T097-24864-00123, issued December 12, 2008, and the Second Part 70 Permit Renewal No. T097-32931-00123, issued September 19, 2014. Based on information provided by the source, all ARC emission units not connected to a baghouse will have negligible PM, PM10 and PM2.5 emissions.

Permit Level Determination – Part 70 Modification to an Existing Source

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. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	379.89
PM_{10}	340.99
$PM_{2.5}$	330.83
SO_2	–
VOC	–
CO	–
NO_X	–
Highest Single HAP	0.01 Mercury (Hg)
Total HAPs	0.01

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

Note: The PTE of PM/PM10/PM2.5 (fugitive dust) from vehicle traffic on paved roads associated with the existing municipal solid waste combustion facility (permitted prior to this modification) are not counted toward the PTE of this modification for the Advanced Recycling Center (ARC).

This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the potential to emit PM, PM10, and PM2.5 is greater than twenty-five (25) tons per year before control. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires significant changes in existing Part 70 monitoring permit terms and conditions.

Permit Level Determination – PSD or Emission Offset or Nonattainment NSR

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 modification and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Project Emissions (ton/yr)								
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**GHGs**	**Hg**
Advanced Recycling Center (ARC)	13.13	12.07	9.53	0.0	0.0	0.0	0.0	0.0	0.01
ARC Roads---Fugitive	5.64	1.13	0.28	0.0	0.0	0.0	0.0	0.0	0.0
Total for Modification	**18.77**	**13.20**	**9.81**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.01**
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	100
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	100	NA	NA	NA	NA	NA
Significant Thresholds	25	15	10	40	40	40	100	75,000 CO_2e	0.1

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than twenty-five (25) tons of PM per year, fifteen (15) tons of PM_{10} per year, and ten (10) tons of direct $PM_{2.5}$ per year, this source has elected to limit the potential to emit of this modification as follows:

In order to render the requirements of 326 IAC 2-2 not applicable for PM, PM10, and PM2.5, the Permittee shall comply with the following:

(a) PM, PM10, and PM2.5 emissions from the following emission units shall not exceed the emission limits specified in the table below:

Emission Units	Control Device	PM Limit (lbs/hr)	PM10 Limit (lbs/hr)	PM2.5 Limit (lbs/hr)
Bag Opener/Size Reducer	Baghouse CE4	1.853	1.853	1.853
Trommel (No.2)				
Trommel (No. 110)				
Star Screen				
Ballistic Separators (No. 800 and No. 630)				
Fines Star Screen				
Twelve (12) Titech Optical Sorters				
Baler and Bale Storage Area				
Ten (10) conveyor belt transfer points				
Fines Loadout Area				
Walair Separator (No. 250)	Baghouse CE5	0.094	0.094	0.094
Walair Separator (No. 470)	Baghouse CE6	0.139	0.139	0.139

(b) The Advanced Recycling Center (ARC) shall not exceed 7,280 hours of operation per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) Fugitive PM, PM10, and PM2.5 emissions from paved roads and parking lots associated with the "Advanced Recycling Center" (ARC) shall be controlled by the following methods:

(1) Except during periods of inclement weather, roadways and other paved areas throughout the facility site shall be daily cleaned with a mechanical sweeper. Particular attention shall be paid to the entrance and the exit roadways at the ash handling building. Mechanical sweeping shall also be focused on what will be a high traffic area between the "Energy-from-Waste" (EfW) facility and the "Advanced Recycling Center" (ARC).

(2) Manual sweeping and vacuuming, if necessary, of any localized spills of solid material shall be conducted to minimize buildup of material on facility roadways.

(3) As a means of dust control, all doors to the ARC shall be kept closed except when the doors are being used.

Compliance with these limits will limit the potential to emit from Significant Source Modification No. 097-35573-00123 to less than twenty-five (25) tons of PM per twelve (12) consecutive month period, less than fifteen (15) tons of PM_{10} per twelve (12) consecutive month period, and less than ten (10) tons of $PM_{2.5}$ per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification.

This modification to an existing major Emission Offset stationary source is not major because the emissions of SO2 will not increase as a result of this modification. 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) included in this proposed modification.

NESHAP

(a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this proposed modification.

CAM

(a) 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 - PM							
Emission Unit / Pollutant	**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)
Bag Opener / Size Reducer	Y	Y	< 100	< 100	100	N	N
Trommel No. 2	Y	Y	< 100	< 100	100	N	N
Trommel No. 110	Y	Y	< 100	< 100	100	N	N
Walair No. 470	Y	Y	< 100	< 100	100	N	N
Star Screen	Y	Y	< 100	< 100	100	N	N
Walair No. 250	Y	Y	< 100	< 100	100	N	N
Ballistic Separators (No. 800 / No. 630)	Y	Y	< 100	< 100	100	N	N
Fines Star Screen	Y	Y	< 100	< 100	100	N	N
Titech Optical Sorter (1 of 12)	Y	Y	< 100	< 100	100	N	N

CAM Applicability Analysis - PM							
Emission Unit / Pollutant	**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)
Baler and Baler Storage Area	Y	Y	< 100	< 100	100	N	N
Conveyor Belt (1 of 10)	Y	Y	< 100	< 100	100	N	N
Fines Loadout	Y	Y	< 100	< 100	100	N	N

CAM Applicability Analysis - PM10							
Emission Unit / Pollutant	**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)
Bag Opener / Size Reducer	Y	Y	< 100	< 100	100	N	N
Trommel No. 2	Y	Y	< 100	< 100	100	N	N
Trommel No. 110	Y	Y	< 100	< 100	100	N	N
Walair No. 470	Y	Y	< 100	< 100	100	N	N
Star Screen	Y	Y	< 100	< 100	100	N	N
Walair No. 250	Y	Y	< 100	< 100	100	N	N
Ballistic Separators (No. 800 / No. 630)	Y	Y	< 100	< 100	100	N	N
Fines Star Screen	Y	Y	< 100	< 100	100	N	N
Titech Optical Sorter (1 of 12)	Y	Y	< 100	< 100	100	N	N
Baler and Baler Storage Area	Y	Y	< 100	< 100	100	N	N
Conveyor Belt (1 of 10)	Y	Y	< 100	< 100	100	N	N
Fines Loadout	Y	Y	< 100	< 100	100	N	N

CAM Applicability Analysis - PM2.5							
Emission Unit / Pollutant	**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)
Bag Opener / Size Reducer	Y	Y	< 100	< 100	100	N	N
Trommel No. 2	Y	Y	< 100	< 100	100	N	N
Trommel No. 110	Y	Y	< 100	< 100	100	N	N

CAM Applicability Analysis - PM2.5							
Emission Unit / Pollutant	**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)
Walair No. 470	Y	Y	< 100	< 100	100	N	N
Star Screen	Y	Y	< 100	< 100	100	N	N
Walair No. 250	Y	Y	< 100	< 100	100	N	N
Ballistic Separators (No. 800 / No. 630)	Y	Y	< 100	< 100	100	N	N
Fines Star Screen	Y	Y	< 100	< 100	100	N	N
Titech Optical Sorter (1 of 12)	Y	Y	< 100	< 100	100	N	N
Baler and Baler Storage Area	Y	Y	< 100	< 100	100	N	N
Conveyor Belt (1 of 10)	Y	Y	< 100	< 100	100	N	N
Fines Loadout	Y	Y	< 100	< 100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the Advanced Recycling Center (ARC) emission units for PM, PM10, and PM2.5.

State Rule Applicability Determination

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

326 IAC 2-1.1-5 (Nonattainment New Source Review)
Nonattainment New Source Review applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

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 operation of the Advanced Recycling Center (ARC) 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 to this modification.

326 IAC 2-6 (Emission Reporting)
Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2017, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Cerification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2).

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), this source is not subject to 326 IAC 6-3, since this source is subject to a particulate matter limitation established in 326 IAC 6.5 that is as stringent as or more stringent than the particulate limitation established in 326 IAC 6-3.

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is subject to the rules of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), since this source has potential fugitive particulate matter emissions of twenty-five (25) tons or more per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, which is included as Attachment C to the permit.

326 IAC 6.5-1-2 (Particulate Emission Limitations)
This source is subject to 326 IAC 6.5-1-2, since this source is located in Marion County, this source is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and this source has the potential to emit ten (10) tons or more of particulate matter per year. Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the Advanced Recycling Center (ARC) emission units and the paved roads and parking lots associated with the "Advanced Recycling Center" (ARC) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Based on the PM emission limit of 0.03 grains per dry standard cubic foot and the flow rate specified in the table below, in order to comply with 326 IAC 6.5-1-2(a), the baghouses for particulate control (CE4, CE5, and CE6) shall be in operation and control emissions from the ARC at all times that the ARC is in operation.

Control Device ID	Flow rate (acfm)	Potential Grain Loading Before Control (grain/dscf)	Potential Grain Loading After Control (grain/dscf)
Baghouse CE4	70630	0.102	0.003
Baghouse CE5	3600	0.102	0.003
Baghouse CE6	5300	0.102	0.003

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.

The Compliance Determination, Monitoring, and Testing Requirements applicable to this modification are as follows:

(a) Compliance Determination Requirements

The baghouses for particulate control, identified as CE4, CE5, and CE6, shall be in operation and control emissions from the ARC at all times that the ARC is in operation.

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.

(b) Compliance Monitoring Requirements

Emission Units	Control Device	Operating Parameters	Frequency	Range	Excursions and Exceedances
Bag Opener/Size Reducer, Trommel (No.2), Trommel (No. 110), Star Screen, Ballistic Separators (No. 800 and No. 630), Fines Star Screen, Twelve (12) Titech Optical Sorters, Baler and Bale Storage Area, Ten (10) conveyor belt transfer points, Fines Loadout Area	Baghouse CE4	Visible emission notations of the stack exhaust	Once per day	Normal or Abnormal	Response Steps

(c) Testing Requirements

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency
Bag Opener/Size Reducer, Trommel (No.2), Trommel (No. 110), Star Screen, Ballistic Separators (No. 800 and No. 630), Fines Star Screen, Twelve (12) Titech Optical Sorters, Baler and Bale Storage Area, Ten (10) conveyor belt transfer points, Fines Loadout Area	Baghouse CE4	No later than 180 days after startup	PM/PM10/PM2.5	Every 5 Years

These conditions are necessary because the baghouses controlling the Bag Opener/Size Reducer, Trommel (No.2), Trommel (No. 110), Star Screen, Ballistic Separators (No. 800 and No. 630), Fines Star Screen, twelve (12) Titech Optical Sorters, Baler and Bale Storage Area, ten (10) conveyor belt transfer points, Walair Separator (No. 250), and Walair Separator (No. 470) must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) and the limits that render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T097-32931-00123. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Modification 1: Section A.2 was updated to include the new emission units and pollution control equipment summary for the Advanced Recycling Center (ARC).

Modification 2: Section D.2 was added to include the emission limitations and standards, compliance determination and monitoring requirements, and record keeping and reporting requirements for the ARC.

Modification 3: A Quarterly Report Form was added for the hours of operation limitation reporting requirement for the ARC.

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:

***

(b) One (1) Advanced Recycling Center (ARC) for recovering ferrous and non-ferrous metals, paper, corrugated cardboard, and plastics from a portion of the incoming municipal solid waste (MSW) stream, identified as Unit 004, approved in 2015 for construction, with a design capacity of 50 tons per hour, consisting of the following equipment:

(1) One (1) MSW Delivery Point at the western entrance to the site using the existing four (4) automated truck scales to provide an accounting of the waste delivered to and the recyclables and residue removed from the ARC, with no controls and vented to the outdoors through the general building ventilation system;

(2) One (1) Enclosed MSW Storage Area with overhead doors and a tipping floor having a maximum storage capacity of approximately 735 tons of MSW, with no controls and vented to the outdoors through the general building ventilation system;

(3) One (1) Pre-Sort Area, with no controls and vented to the outdoors through the general building ventilation system, where waste received at the tipping floor is presorted into the following parts:

(A) Old Corrugated Cardboard;
(B) Large Items; and
(C) Propane Tanks and Large Metals.

(4) One (1) Bag Opener/Size Reducer to open returned bags of waste and process feed from the Pre-Sort Area, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(5) One (1) Overbelt Magnet to recover ferrous metal from the processed waste stream, with no controls and vented to the outdoors through the general building ventilation system;

(6) One (1) Trommel (No.2) for size classification with large items returned to the Pre-Sort Area for reprocessing or removal from the process, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(7) One (1) Trommel (No. 110) for further size classification, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(8) One (1) Walair Separator (No. 470) which separates Medium/Heavy and Light Density materials from the Trommel No. 110 overs stream, controlled by a baghouse, identified as CE6, and exhausting to the outdoors;

(9) One (1) Star Screen to size sort materials from the Trommel No. 110 unders stream, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(10) One (1) Walair Separator (No. 250) which separates Medium/Heavy and Light Density materials from the Star Screen overs stream, controlled by a baghouse, identified as CE5, and exhausting to the outdoors;

(11) Two (2) Ballistic Separators (No. 800 and No. 630) to process the Medium/Heavy materials separated by the Walair Separators, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(12) One (1) Eddy Current Separator to recover non-ferrous metals from the materials sorted by the Ballistic Separators and the Star Screen, with no controls and vented to the outdoors through the general building ventilation system;

(13) One (1) Fines Star Screen to process non-ferrous materials from the Ballistic Separators and the Eddy Current Separator, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(14) Twelve (12) Titech Optical Sorters to sort and recover small mixed paper, large mixed paper, OCC, plastic, polyethylene terephthalate, high-density polyethylene, polypropylene from non-recyclable waste material, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(15) One (1) Baler and Bale Storage Area located in the western end of the ARC for packaging and storage of recyclables prior to shipment to markets, controlled by a baghouse, identified as CE4;

(16) Ten (10) conveyor belt transfer points, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(17) One (1) Recyclables Loadout Area located in the northwestern corner of the ARC and consisting of a flush loading dock design with four (4) truck bays equipped with roll-up doors, with no controls and vented to the outdoors through the general building ventilation system;

(18) One (1) Remaining MSW Exit Point consisting of an enclosed, inclined conveyor for the transport of the remaining MSW from the ARC to a single gravity-fed chute located in the northwestern corner of the tipping floor of the adjacent Indianapolis Resource Recovery Facility, with no controls and vented to the outdoors through the general building ventilation system and used as combustion air within the Indianapolis Resource Recovery Facility; and

(19) One (1) Fines Loadout Area located at the southern interior wall of the proposed ARC and consisting of two (2) truck bays where fines, including dirt, broken glass and small pieces of paper, which have been conveyed into 40 cubic yard containers within the ARC, will be loaded onto trucks for disposal at a licensed landfill, controlled by a baghouse, identified as CE4, and exhausting to the outdoors.

****

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

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

****

(n) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6.5]**[326 IAC 6-5]**

****

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(4**2**~~0~~). 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).

****

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

****

(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(3**7**~~6~~)) 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:

****

C.5 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment C.

Subsequent C Section conditions were renumbered accordingly.

****

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

***

Insignificant Activities:

***

(n) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6.5]**[326 IAC 6-5]**

***

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

****

D.1.22 Reporting Requirements

A quarterly report of opacity exceedances shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(~~34~~**35**).

D.1.23 Reporting Requirements for CEMS [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 3-5]

***

The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(~~34~~**35**).

(b) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:

***

The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(~~34~~**35**).

****

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) Advanced Recycling Center (ARC) for recovering ferrous and non-ferrous metals, paper, corrugated cardboard, and plastics from a portion of the incoming municipal solid waste (MSW) stream, identified as Unit 004, approved in 2015 for construction, with a design capacity of 50 tons per hour, consisting of the following equipment:

(1) One (1) MSW Delivery Point at the western entrance to the site using the existing four (4) automated truck scales to provide an accounting of the waste delivered to and the recyclables and residue removed from the ARC, with no controls and vented to the outdoors through the general building ventilation system;

(2) One (1) Enclosed MSW Storage Area with overhead doors and a tipping floor having a maximum storage capacity of approximately 735 tons of MSW, with no controls and vented to the outdoors through the general building ventilation system;

(3) One (1) Pre-Sort Area, with no controls and vented to the outdoors through the general building ventilation system, where waste received at the tipping floor is presorted into the following parts:

(A) Old Corrugated Cardboard;
(B) Large Items; and
(C) Propane Tanks and Large Metals.

(4) One (1) Bag Opener/Size Reducer to open returned bags of waste and process feed from the Pre-Sort Area, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(5) One (1) Overbelt Magnet to recover ferrous metal from the processed waste stream, with no controls and vented to the outdoors through the general building ventilation system;

(6) One (1) Trommel (No.2) for size classification with large items returned to the Pre-Sort Area for reprocessing or removal from the process, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(7) One (1) Trommel (No. 110) for further size classification, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(8) One (1) Walair Separator (No. 470) which separates Medium/Heavy and Light Density materials from the Trommel No. 110 overs stream, controlled by a baghouse, identified as CE6, and exhausting to the outdoors;

(9) One (1) Star Screen to size sort materials from the Trommel No. 110 unders stream, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(10) One (1) Walair Separator (No. 250) which separates Medium/Heavy and Light Density materials from the Star Screen overs stream, controlled by a baghouse, identified as CE5, and exhausting to the outdoors;

(11) Two (2) Ballistic Separators (No. 800 and No. 630) to process the Medium/Heavy materials separated by the Walair Separators, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(12) One (1) Eddy Current Separator to recover non-ferrous metals from the materials sorted by the Ballistic Separators and the Star Screen, with no controls and vented to the outdoors through the general building ventilation system;

(13) One (1) Fines Star Screen to process non-ferrous materials from the Ballistic Separators and the Eddy Current Separator, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(14) Twelve (12) Titech Optical Sorters to sort and recover small mixed paper, large mixed paper, OCC, plastic, polyethylene terephthalate, high-density polyethylene, polypropylene from non-recyclable waste material, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(15) One (1) Baler and Bale Storage Area located in the western end of the ARC for packaging and storage of recyclables prior to shipment to markets, controlled by a baghouse, identified as CE4;

(16) Ten (10) conveyor belt transfer points, controlled by a baghouse, identified as CE4, and exhausting to the outdoors;

(17) One (1) Recyclables Loadout Area located in the northwestern corner of the ARC and consisting of a flush loading dock design with four (4) truck bays equipped with roll-up doors, with no controls and vented to the outdoors through the general building ventilation system;

(18) One (1) Remaining MSW Exit Point consisting of an enclosed, inclined conveyor for the transport of the remaining MSW from the ARC to a single gravity-fed chute located in the northwestern corner of the tipping floor of the adjacent Indianapolis Resource Recovery Facility, with no controls and vented to the outdoors through the general building ventilation system and used as combustion air within the Indianapolis Resource Recovery Facility; and

(19) One (1) Fines Loadout Area located at the southern interior wall of the proposed ARC and consisting of two (2) truck bays where fines, including dirt, broken glass and small pieces of paper, which have been conveyed into 40 cubic yard containers within the ARC, will be loaded onto trucks for disposal at a licensed landfill, controlled by a baghouse, identified as CE4, and exhausting to the outdoors.

Insignificant Activities:

(n) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6.5][326 IAC 6-5]

(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 PSD Minor Particulate Limitations [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable for PM, PM10, and PM2.5, the Permittee shall comply with the following:

(a) PM, PM10, and PM2.5 emissions from the following emission units shall not exceed the emission limits specified in the table below:

Emission Units	Control Device	PM Limit (lbs/hr)	PM10 Limit (lbs/hr)	PM2.5 Limit (lbs/hr)
Bag Opener/Size Reducer	Baghouse CE4	1.853	1.853	1.853
Trommel (No.2)				
Trommel (No. 110)				
Star Screen				
Ballistic Separators (No. 800 and No. 630)				
Fines Star Screen				
Twelve (12) Titech Optical Sorters				
Baler and Bale Storage Area				
Ten (10) conveyor belt transfer points				
Fines Loadout Area				
Walair Separator (No. 250)	Baghouse CE5	0.094	0.094	0.094
Walair Separator (No. 470)	Baghouse CE6	0.139	0.139	0.139

(b) The Advanced Recycling Center (ARC) shall not exceed 7,280 hours of operation per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) Fugitive PM, PM10, and PM2.5 emissions from paved roads and parking lots associated with the "Advanced Recycling Center" (ARC) shall be controlled by the following methods:

(1) Except during periods of inclement weather, roadways and other paved areas throughout the facility site shall be daily cleaned with a mechanical sweeper. Particular attention shall be paid to the entrance and the exit roadways at the ash handling building. Mechanical sweeping shall also be focused on what will be a high traffic area between the "Energy-from-Waste" (EfW) facility and the "Advanced Recycling Center" (ARC).

(2) Manual sweeping and vacuuming, if necessary, of any localized spills of solid material shall be conducted to minimize buildup of material on facility roadways.

(3) As a means of dust control, all doors to the ARC shall be kept closed except when the doors are being used.

Compliance with these limits will limit the potential to emit from Significant Source Modification No. 097-35573-00123 to less than twenty-five (25) tons of PM per twelve (12) consecutive month period, less than fifteen (15) tons of PM_{10} per twelve (12) consecutive month period, and less than ten (10) tons of $PM_{2.5}$ per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification.

D.2.2 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6-5.1-2(a), particulate matter (PM) emissions from each of the Advanced Recycling Center (ARC) emission units and the paved roads and parking lots associated with the "Advanced Recycling Center" (ARC) shall not exceed 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for each of the Advanced Recycling Center (ARC) emission units and any associated 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.2.4 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to ensure compliance with Conditions D.2.1(a) and D.2.2, Baghouses CE4, CE5, and CE6 shall be in operation and controlling emissions at all times the ARC is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

Not later than 180 days after the startup of the ARC, in order to demonstrate compliance with Conditions D.2.1(a) and D.2.2, the Permittee shall perform PM, PM10, and PM2.5 testing of the ARC Baghouse 1, identified as CE4, utilizing methods approved by the commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

D.2.6 Visible Emission Notations

(a) Daily visible emission notations of the stack exhaust of ARC Baghouse 1, identified as CE4, shall be performed during normal daylight operations, when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C- Response to Excursions and Exceedances contains the Permittee's obligation 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.2.7 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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 has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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 baghouse's 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.2.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.1(b), the Permittee shall maintain records of the hours of operation of the ARC.

(b) To document the compliance status with Condition D.2.1(c), the Permittee shall maintain records of the date, approximate time, and type of each fugitive dust control measure used (e.g., mechanical sweeping, vacuuming, keeping the ARC doors closed except when the doors are being used).

(c) To document the compliance status with Condition D.2.6(a), the Permittee shall maintain daily records of the visible emission notations of each stack exhaust from the ARC Baghouse 1, identified as CE4. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (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 record keeping required by this condition.

D.2.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.1(b) shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

Part 70 Quarterly Report

Source Name: **Covanta Indianapolis, Inc.**
Source Address: **2320 S. Harding Street, Indianapolis, Indiana 46221**
Part 70 Permit No.: **T097-32931-00123**
Facility: **Advanced Recycling Center (ARC)**
Parameter: **Hours of Operation**
Limits: **The Advanced Recycling Center (ARC) shall not exceed 7,280 hours of operation per twelve (12) consecutive month period, with compliance determined at the end of each month.**

QUARTER:_____ **YEAR:**_____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 097-35573-00123 and Significant Permit Modification No. 097-35639-00123. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to David Matousek at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8253 or toll free at 1-800-451-6027 extension 2-8253.

(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: Emission Calculations
Summary of Potential Emissions

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Unlimited/Uncontrolled Potential to Emit (tons per year)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO2e	Total HAPs	Highest Single HAP	
Natural Gas Burners	6.99	27.96	27.96	2.21	1030.18	20.24	309.05	444,128	6.94	6.62	Hexane
Municipal Solid Waste Combustion Units (EU1, EU2, and EU3)	9976.87	Greater Than 100.00	Greater Than 100.00	1375.30	1415.05	8.74	184.04	892,190	2643.55	2543.90	Hydrochloric Acid
Lime System	6.74	6.71	6.68	--	--	--	--	--	--	--	--
Emergency Fire Pump	0.10	0.10	0.10	0.09	1.37	0.11	0.30	51	1.2E-03	3.7E-04	Formaldehyde
Lime Roads	0.91	0.18	0.04	--	--	--	--	--	--	--	--
Wastewater Minimization Project	0.23	0.23	0.23	--	--	--	--	--	0.23	0.11	Zinc
Advanced Recycling Center (ARC)	332.85	331.59	328.52	--	--	--	--	--	0.01	0.01	Mercury
ARC Roads	47.04	9.41	2.31	--	--	--	--	--	--	--	--
Incinerator Roads	66.07	13.21	3.24								
Total	**10437.79**	**Greater Than 489.38**	**Greater Than 469.09**	**1377.60**	**2446.59**	**29.09**	**493.38**	**1,336,369**	**2650.73**	**2543.90**	**Hydrochloric Acid**

Limited/Controlled Potential to Emit (tons per year)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO2e	Total HAPs	Highest Single HAP	
Natural Gas Burners	6.99	27.96	27.96	2.21		20.24	309.05	444,128	6.94	6.62	Hexane
Municipal Solid Waste Combustion Units (EU1, EU2, and EU3)	24.64	Greater Than 100.00	Greater Than 100.00	220.21	Less Than 662.25	8.74	184.04	892,190	21.57	20.99	Hydrochloric Acid
Lime System	6.74	6.71	6.68	--	--	--	--	--	--	--	--
Emergency Fire Pump	0.10	0.10	0.10	0.09	1.37	0.11	0.30	51	1.2E-03	3.7E-04	Formaldehyde
Lime Roads	0.91	0.18	0.04	--	--	--	--	--	--	--	--
Wastewater Minimization Project	0.23	0.23	0.23	--	--	--	--	--	0.23	0.11	Zinc
Advanced Recycling Center (ARC)	13.13	12.07	9.53	--	--	--	--	--	0.01	0.01	Mercury
ARC Roads	5.64	1.13	0.28	--	--	--	--	--	--	--	--
Incinerator Roads	7.93	1.59	0.39								
Total	**66.30**	**Greater Than 149.96**	**Greater Than 145.21**	**222.50**	**Less Than 663.62**	**29.09**	**493.38**	**1,336,369**	**28.75**	**20.99**	**Hydrochloric Acid**

Appendix A: Emission Calculations
Summary of Potential Emissions

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Unlimited/Uncontrolled Potential to Emit (tons per year)											
Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_x**	**VOC**	**CO**	**GHGs as CO2e**	**Total HAPs**	**Highest Single HAP**	
Advanced Recycling Center (ARC)	332.85	331.59	328.52	--	--	--	--	--	0.01	0.01	Mercury
ARC Roads	47.04	9.41	2.31	--	--	--	--	--	--	--	--
Total	379.89	340.99	330.83	0.00	0.00	0.00	0.00	0.00	0.01	0.01	Mercury

Limited/Controlled Potential to Emit (tons per year)											
Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_x**	**VOC**	**CO**	**GHGs as CO2e**	**Total HAPs**	**Highest Single HAP**	
Advanced Recycling Center (ARC)	13.13	12.07	9.53	--	--	--	--	--	0.01	0.01	Mercury
ARC Roads	5.64	1.13	0.28	--	--	--	--	--	--	--	--
Total	18.77	13.20	9.81	0.00	0.00	0.00	0.00	0.00	0.01	0.01	Mercury

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR >100
Natural Gas-Fired Burners for Start-Up, Shutdown, and Flame Stabilization

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Emission Units	Heat Input Capacity MMBtu/hr*
EU1	280
EU2	280
EU3	280

Total Heat Input Capacity MMBtu/hr: 840.0

Potential Throughput MMCF/yr: 7358.4

*Each unit has two (2) 140 MMBtu/hr natural gas fired burners

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	280.0 **see below	5.5	84.0
Potential Emission in tons/yr	7.0	28.0	28.0	2.2	1030.2	20.2	309.1

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined. PM2.5 emission factor is condensable and filterable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See Table 1.4-1)

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

	HAPs - 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	7.7E-03	4.4E-03	0.28	6.62	0.01

	HAPs - 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	1.8E-03	4.0E-03	5.2E-03	1.4E-03	7.7E-03

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 Gases (GHGs)

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	441,504	8.5	8.1
Summed Potential Emissions in tons/yr	441,521		
CO2e Total in tons/yr	444,128		

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) = 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
Municipal Solid Waste Combustion units (EU1, EU2, and EU3)
Uncontrolled Emissions

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Emission Units	Maximum Throughput (tons/day)
EU1	726
EU2	726
EU3	726
Total	**2178**

Total Potential Throughput (lbs/hr)	Total Potential Throughput (ton/yr)
181500	794970

Heat Content (Btu/lb)	Total Maximum Heat Input (MMBtu/hr)
5500	998.25

	POLLUTANT				
	*PM	*SO_2	†CO	VOC	†NO_X
Emission Factor in lb/ton	25.1	3.46	0.463	0.022	3.56
Potential Emissions in ton/yr	9976.9	1375.3	184.0	8.74	1415.0

Methodology

*Emission factors are from AP 42 (5th Edition 10/96) Table 2.1-2, Particulate Matter, Metals, and Acid Gas Emissions Factors for Mass Burn and Modular Excess Air Combustors
†Emission factors are from AP 42 (5th Edition 10/96) Table 2.1-4, Organic, Nitrogen Oxides, Carbon Monoxide, and Carbon Dioxide Emission Factors for Mass Burn Waterwall Combustors
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)
The VOC emission factor was calculated by dividing the VOC emissions from 2004 by the throughput of solid waste from 2004
4920 lbs of VOC / 221627 tons of solid waste burned = 0.22 lbs of VOC / ton

Hazardous Air Pollutants (HAPs)

	POLLUTANT						
	Arsenic	Cadmium	Chromium	Mercury	Nickel	Lead	Hydrochloric Acid
Emission Factor in lb/ton	4.37E-03	1.09E-02	8.97E-03	5.60E-03	7.85E-03	0.2130	6.4000
Potential Emissions in ton/yr	1.74	4.33	3.57	2.23	3.12	84.66	2543.9

Methodology
All Emission factors are from AP 42 (5th Edition 10/96) Table 2.1-2 , Particulate Matter, Metals, and Acid Gas Emission Factors For Mass Burn and Modular Excess Air Combustors
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)
Emission factors from AP 42 (5th Edition 1/95) Table 2.1-2 and 2.1-4, were multiplied by the source's Btu value of 5500/lb and then divided by the assumed Btu value of 4500/lb to arrive at the correct emission factor. This equation is based on EPA guidance in AP-42 Table 2.1-2 footnote A. The source's Btu value of 5500/lb is based on average Btu values from montly reports

Greenhouse Gases (GHGs)

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMBtu	199.54	0.0704	0.00924
Potential Emission in tons/yr	872,456	307.81	40.40
Summed Potential Emissions in tons/yr	872,804		
CO2e Total in tons/yr	892,190		

Methodology
Emission Factors are from 40 CFR 98 Subpart C, Table C-1 and C-2
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Heat Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 /2,000 lb/ton
CO2e (tons/yr) = 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
Municipal Solid Waste Combustion units (EU1, EU2, and EU3)
Controlled Emissions

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Emission Units	Maximum Throughput (tons/day)
EU1	726
EU2	726
EU3	726
Total	**2178**

Total Potential Throughput (lbs/hr)	Total Potential Throughput (ton/yr)
181500	794970

Heat Content (Btu/lb)	Total Maximum Heat Input (MMBtu/hr)
5500	998.25

	POLLUTANT				
	*PM	*SO_2	**CO	***VOC	**NO_X
Emission Factor in lb/ton Controls****	0.062 SD/FF	0.554 SD/FF	0.463	0.022	3.56
Potential Emissions in ton/yr	24.6	220.2	184.0	8.74	1415.0
Limited Emissions in ton/yr					< 662.25

Methodology
*Emission factors are from AP 42 (5th Edition 10/96) Table 2.1-2, Particulate Matter, Metals, and Acid Gas Emissions Factors for Mass Burn and Modular Excess Air Combustors
**Emission factors are from AP 42 (5th Edition 10/96) Table 2.1-4, Organic, Nitrogen Oxides, Carbon Monoxide, and Carbon Dioxide Emission Factors for Mass Burn Waterwall Combustors
***The VOC emission factor was calculated by dividing the VOC emissions from 2004 by the throughput of solid waste from 2004
****Controls: SD/FF = Spray Dryer/Fabric Filter
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)
4920 lbs of VOC / 221627 tons of solid waste burned = 0.22 lbs of VOC / ton

Hazardous Air Pollutants (HAPs)

	POLLUTANT						
	Arsenic	Cadmium	Chromium	Mercury	Nickel	Lead	Hydrochloric Acid
Emission Factor in lb/ton	5.17E-06	3.32E-05	4.04E-05	2.92E-04	6.30E-05	1.04E-03	5.28E-02
Potential Emissions in ton/yr	2.1E-03	0.01	0.02	0.12	0.03	0.41	21.0

Methodology
All Emission factors are from AP 42 (5th Edition 10/96) Table 2.1-2 , Particulate Matter, Metals, and Acid Gas Emission Factors For Mass Burn and Modular Excess Air Combustors
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)
Emission factors from AP 42 (5th Edition 1/95) Table 2.1-2 and 2.1-4, were multiplied by the source's Btu value of 5500/lb and then divided by the assumed Btu value of 4500/lb to arrive at the correct emission factor. This equation is based on EPA guidance in AP-42 Table 2.1-2 footnote A. The source's Btu value of 5500/lb is based on average Btu values from monthly reports

Greenhouse Gases (GHGs)

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMBtu	199.54	0.0704	0.00924
Potential Emission in tons/yr	872,456	307.81	40.40
Summed Potential Emissions in tons/yr	872,804		
CO2e Total in tons/yr	892,190		

Methodology
Emission Factors are from 40 CFR 98 Subpart C, Table C-1 and C-2
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Heat Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 /2,000 lb/ton
CO2e (tons/yr) = 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
Lime Unloading

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.1, the PM/PM10/PM2.5 emission factors can be estimated from the following equation:

$$E = (k \times (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4}$$

where:

E = emission factor
k = Particle Size Multiplier: PM=0.74, PM10=0.35, PM2.5=0.053
U = Mean wind speed 9.6 mile/hr
M= % material moisture content 2.1

PM Emission Factor =	k x (0.0032) x (U/5) 1.3 / (M/2) 1.4 =	0.01	lb/ton
PM10 Emission Factor =	k x (0.0032) x (U/5) 1.3 / (M/2) 1.4 =	0.002	lb/ton
PM2.5 emission Factor =	k x (0.0032) x (U/5) 1.3 / (M/2) 1.4 =	0.0004	lb/ton

2. Potential to Emit (PTE) of PM/PM10/PM2.5:

Operation	Annual Usage* (tons/yr)	PM Emission Factor (lb/ton)	PTE of PM (tons/yr)	PM10 Emission Factor (lb/ton)	PTE of PM10 (tons/yr)	PM2.5 Emission Factor (lb/ton)	PTE of PM2.5 (ton/yr)
Loading: Truck-drop to hopper	21900.00	0.01	0.057	0.0024	0.027	0.0004	0.004

Operation	Annual Usage* (tons/yr)	PM/PM10/PM2.5 Emission Factor (lb/ton)	PTE of PM/PM10/PM2.5 (tons/yr)
Loading: Hopper to inclosed conveyor	21900.00	0.61	6.680

	PM	PM10	PM2.5
Total (ton/yr)	**6.74**	**6.71**	**6.68**
Total (lb/hr)	**1.5**	**1.5**	**1.5**

* This information is provided by the source.

Methodology

PTE (tons/yr) = (annual usage (tons/yr) x Emission Factors x 1 ton/2000 lbs

Process Rate (tons/hr) = 2.5
Process Rate (lb/hr) = 5000

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (<=600 HP)
Maximum Input Rate (<=4.2 MMBtu/hr)

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Output Horsepower Rating (hp)	177.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	88,500

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	0.10	0.10	0.10	0.09	1.37	0.11	0.30

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs***
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	2.9E-04	1.3E-04	8.8E-05	1.2E-05	3.7E-04	2.4E-04	2.9E-05	5.2E-05

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)
****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	**1.2E-03**

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/hp-hr	########	4.63E-05	9.26E-06
Potential Emission in tons/yr	50.9	2.0E-03	4.1E-04

Summed Potential Emissions in tons/yr	**50.9**
CO2e Total in tons/yr	**51.1**

Methodology
Emission Factors are from AP42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2
CH4 and N2O Emission Factor from 40 CFR 98 Subpart C Table C-2.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]
Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]
CO2e (tons/yr) = 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
Lime Operation Fugitive Dust Emissions - Paved Roads

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

Type	Maximum trips per day (trip/year)	Maximum Weight Loaded (tons/trip)	Maximum one-way miles (miles/yr)
Dump Truck	1460.0	19.5	1106.0

Average Vehicle Weight Per Trip = 19.5 tons/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	19.5	19.5	19.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.800	0.360	0.0883	lb/mile
Mitigated Emission Factor, Eext =	1.646	0.329	0.0808	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Dump Truck	1.00	0.20	0.05	0.91	0.18	0.04
Totals	**1.00**	**0.20**	**0.05**	**0.91**	**0.18**	**0.04**

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

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emission Calculations
Estimated Emissions - Wastewater Minimization Project

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Design Flow:	120	gallons per minute (GPM)
	172,800	gallons per day (GPD)
	63,072,000	million gallons per year

PM, PM_{10}, $PM_{2.5}$, HAP and VOC Emissions				
Pollutant	Estimated Concentration (mg/l)	PTE (lbs/hour)	PTE (tons/year)	Data Source
Amenable Cyanide	negligible	negligible	negligible	Industrial Waste Permit #495301
Arsenic	negligible	negligible	negligible	Industrial Waste Permit #495301
Hexavalent Chromium	negligible	negligible	negligible	Industrial Waste Permit #495301
Mercury	negligible	negligible	negligible	Industrial Waste Permit #495301
Nickel	negligible	negligible	negligible	Industrial Waste Permit #495301
Pentachlorphenol	negligible	negligible	negligible	Industrial Waste Permit #495301
Phenol	negligible	negligible	negligible	Industrial Waste Permit #495301
Polychlorinated Biphenyls	negligible	negligible	negligible	Industrial Waste Permit #495301
Silver	negligible	negligible	negligible	Industrial Waste Permit #495301
Total Chromium	negligible	negligible	negligible	Industrial Waste Permit #495301
Total Petroleum Hydrocarbons	negligible	negligible	negligible	Industrial Waste Permit #495301
Cadmium (Cd)	0.010	6.01E-04	2.63E-03	Worst Case from Testing
Copper (Cu)	0.100	6.01E-03	0.03	Worst Case from Testing
Lead (Pb)	0.329	0.02	0.09	Worst Case from Testing
Zinc (Zn)	0.420	0.03	0.11	Worst Case from Testing
Total Dissolved Solids	0.859	0.05	0.23	Sum of Dissolved Solids (Cd, Cu, Pb, Zn)

Total HAP **0.23 tons/year**
Highest Single HAP - Zinc **0.11 tons/year**
$PM/PM_{10}/PM_{2.5}$ **0.23 tons/year**

Notes:
1) IDEM, OAQ assumed total suspended solids in the water are removed in the filter press prior to reusing the water.
2) IDEM, OAQ assumed the only dissolved solids are cadmium, copper, lead, and zinc.
3) IDEM, OAQ assumed PM, PM10 and PM2.5 are emitted at identical rates.
4) IDEM, OAQ assumed all water is evaporated, with dissolved solids forming particulate matter.

Methodology:
1) PTE (lbs/hour) = Flow (gal/min) x 3.78541 liter/gallon x 60 min/hr x concentration (mg/l) x 1 lb/453.59 g x 1 g/1,000 mg
2) PTE (tons/year) = PTE (lbs/hour) x 8,760 hr/yr x 1 ton/2,000 lb

Appendix A: Emission Calculations
Advanced Recycling Center (ARC)
PM, PM10, PM2.5

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Maximum Hours of Operation	**8760**	hours/yr
Limited Hours of Operation	**7280**	hours/yr

Captured Emissions

Control Device	Baghouse ID	Outlet Grain Loading (mg/m3)	Outlet Grain Loading (gr/dscf)	Flow Rate (scfm)	Captured/Uncontrolled PTE of PM/PM10/PM2.5 (Before Controls)		Control Efficiency	Captured/Controlled PTE of PM/PM10/PM2.5 (After Controls)	
					(lbs/hr)	(tons/yr)		(lbs/hr)	(tons/yr)
ARC Baghouse 1	CE4	7.00	0.003059	70630	66.14	289.69	97.2%	1.852	8.111
ARC Baghouse 2	CE5	7.00	0.003059	3600	3.37	14.77	97.2%	0.094	0.413
ARC Baghouse 3	CE6	7.00	0.003059	5300	4.96	21.74	97.2%	0.139	0.609
					74.47	**326.19**		**2.085**	**9.133**

Captured/Limited			
Two Limits-- (1) lbs/hr (2) hours of operation			
Hourly Emission Limits (PSD Minor Project)		Hours of Operation Limit (PSD Minor Project)	
PM/PM10/PM2.5 Limit	Equivalent Limited Efficiency	Hours of Operation Limit	Captured/Limited PTE of PM/PM10/PM2.5
(lbs/hr)		(hours/yr)	(tons/yr)
1.853	97.2%	7280	6.745
0.094	97.2%	7280	0.342
0.139	97.2%	7280	0.506
2.086			**7.593**

Methodology
For each baghouse, outlet grain loading (mg/m3), flow rate (SCFM), and control efficiency (%) provided by the source.
Outlet grain loading (gr/dscf) = outlet grain loading (mg/m3) * (1 g / 1000 mg) * (1 lb / 453.5924 grams) * (7000 grains / lb) * (1 m3 / 3.28084^3 ft3)
Captured/Uncontrolled PTE of PM/PM10/PM2.5 (Before Controls) (lbs/hr) = Flow Rate (scfm) * Outlet Grain Loading (gr/scfm) * 60 (min/hr) * 1/7000 (lb/gr) * 1/(1-Control Efficiency (%))
Captured/Uncontrolled PTE of PM/PM10/PM2.5 (Before Controls) (tons/yr) = PTE of PM/PM10/PM2.5 (Before Controls) (lbs/hr) * 8760 (hr/yr) * 1/2000 (ton/lbs)
Captured/Uncontrolled PTE of PM/PM10/PM2.5 (After Controls) (lbs/hr) = Flow Rate (scfm) * Outlet Grain Loading (gr/scfm) * 60 (min/hr) * 1/7000 (lb/gr)
Captured/Uncontrolled PTE of PM/PM10/PM2.5 (After Controls) (tons/yr) = PTE of PM/PM10/PM2.5 (After Controls) (lbs/hr) * 8760 (hr/yr) * 1/2000 (ton/lbs)
Captured/Limited PTE of PM/PM10/PM2.5 (tons/year) = PM/PM10/PM2.5 Limit (lbs/hr) * Hours of Operation Limit (hours/yr) * 1/2000 (ton/lbs)
Note: Based on information provided by the source, all ARC emission units not connected to a baghouse will have negligible PM, PM10 and PM2.5 emissions.

Uncaptured Emissions (Exhausting to the outdoors through the general ventilation system)

	PM10	PM2.5
Particle Size Distribution	81%	35%

AP-42 Appendix B.2 Generalized Particle Size Distributions Table B.2.2 Category 3 (material handling and processing of aggregate and unprocessed ore)

Control Device	Baghouse ID	Particulate Inlet Loading	Particulate Inlet loading to control	Flow Rate (scfm)	Particulate Inlet loading to control	Capture Efficiency	Total Captured/ Controlled PTE of PM	**Uncaptured Emissions (Exhausting to the outdoors through the general ventilation system)** Uncaptured PTE of PM		Uncaptured PTE of PM10		Uncaptured PTE of PM2.5	
		mg/m3	lb/ft3		lbs/hr		lbs/hr	lbs/hr	ton/year	lbs/hr	ton/year	lbs/hr	ton/year
ARC Baghouse 1	CE4	250	1.56E-05	70630	66.14	98%	67.49	1.35	5.91	1.09	4.79	0.47	2.07
ARC Baghouse 2	CE5	250	1.56E-05	3600	3.37	98%	3.44	0.07	0.30	0.06	0.24	0.02	0.11
ARC Baghouse 3	CE6	250	1.56E-05	5300	4.96	98%	5.06	0.10	0.44	0.08	0.36	0.04	0.16
Total					**74.47**		**75.99**	**1.52**	**6.66**	**1.23**	**5.39**	**0.53**	**2.33**

Uncaptured/Limited (Exhausting to the outdoors through the general ventilation system)			
Hours of Operation Limit	Uncaptured/ Limited PTE of PM	Uncaptured/ Limited PTE of PM10	Uncaptured/ Limited PTE of PM2.5
(hours/yr)	ton/year	ton/year	ton/year
7280	4.91	3.98	1.72
7280	0.25	0.20	0.09
7280	0.37	0.30	0.13
	5.53	**4.48**	**1.94**

Methodology
The hood capture efficiency is 98% per the engineering company design basis (information provided by the source).
Particulate Inlet loading and SCFM provided by the source.
Inlet Loading to Control (lb/ft3) = Inlet Loading to Control (mg/m3) * (1 g / 1000 mg) * (1 lb / 453.5924 grams) * (1 m3 / 3.28084^3 ft3)
Particulate Inlet to Control (lbs/hr) = Inlet Loading to Control (lb/ft3) * Flow Rate (scfm) * 60 mins/hr
Total Uncaptured/ Uncontrolled Emission Rate (lbs/hr) = Particulate Inlet Loading to Control (lbs/hr) / 98% Capture Efficiency
Uncaptured PTE of PM (lbs/hr) = (Total Uncaptured/Uncontrolled PTE of PM (lbs/hr) - Particulate Inlet loading to Control (lbs/hr)) * (8760 hrs/yr) / (2000 lbs/ton)
Uncaptured PTE of PM10 (lbs/hr) = (Total Uncaptured/Uncontrolled PTE of PM (lbs/hr) - Particulate Inlet loading to Control (lbs/hr)) * (81% PM10)
Uncaptured PTE of PM2.5 (lbs/hr) = (Total Uncaptured/Uncontrolled PTE of PM (lbs/hr) - Particulate Inlet loading to Control (lbs/hr)) * (35% PM2.5)
Uncaptured PTE of PM (tons/yr) = Uncaptured PTE of PM (lbs/hr) * (8760 hrs/yr) / (2000 lbs/ton)
Uncaptured PTE of PM10 (tons/yr) = Uncaptured PTE of PM10 (lbs/hr) * (8760 hrs/yr) / (2000 lbs/ton)
Uncaptured PTE of PM2.5 (tons/yr) = Uncaptured PTE of PM2.5 (lbs/hr) * (8760 hrs/yr) / (2000 lbs/ton)
Uncaptured/Limited PTE of PM (tons/yr) = Uncaptured PTE of PM (lbs/hr) * Hours of Operation Limit (hours/yr) * 1/2000 (ton/lbs)
Uncaptured/Limited PTE of PM10 (tons/yr) = Uncaptured PTE of PM10 (lbs/hr) * Hours of Operation Limit (hours/yr) * 1/2000 (ton/lbs)
Uncaptured/Limited PTE of PM2.5 (tons/yr) = Uncaptured PTE of PM2.5 (lbs/hr) * Hours of Operation Limit (hours/yr) * 1/2000 (ton/lbs)

Total Emissions

Control Device	Baghouse ID	Unlimited/Uncontrolled PM (tons/yr)	Unlimited/Uncontrolled PM10 (tons/yr)	Unlimited/Uncontrolled PM2.5 (tons/yr)	Limited/Controlled PM (tons/yr)	Limited/Controlled PM10 (tons/yr)	Limited/Controlled PM2.5 (tons/yr)
ARC Baghouse 1	CE4	295.60	294.48	291.76	11.66	10.72	8.46
ARC Baghouse 2	CE5	15.07	15.01	14.87	0.59	0.55	0.43
ARC Baghouse 3	CE6	22.18	22.10	21.89	0.87	0.80	0.63
Total		**332.85**	**331.59**	**328.52**	**13.13**	**12.07**	**9.53**

Methodology
Unlimited/Uncontrolled PTE of PM/PM10/PM2.5 = Captured/Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr) + Uncaptured PTE of PM/PM10/PM2.5 (tons/yr)
Limited/Controlled PTE of PM/PM10/PM2.5 = Captured/Limited PTE of PM/PM10/PM2.5 (tons/yr) + Uncaptured/Limited PTE of PM/PM10/PM2.5 (tons/yr)

326 IAC 6.5 Particulate Matter Limitations Except Lake County

Baghouse ID	Flow Rate (scfm)	326 IAC 6.5-1-2 Limit (grains/dscf)	326 IAC 6.5-1-2 Allowable PM (lbs/hr)	Captured/Uncontrolled PM (lbs/hr)	Captured/Controlled PM (lbs/hr)	Able to Comply with 326 IAC 6.5-1-2?	Potential Grain Loading Before Control (grain/dscf)	Potential Grain Loading After Control (grain/dscf)
CE4	70630	0.0300	18.16	66.14	1.85	yes, with control	0.109	0.003
CE5	3600	0.0300	0.93	3.37	0.09	yes, with control	0.109	0.003
CE6	5300	0.0300	1.36	4.96	0.14	yes, with control	0.109	0.003

Methodology
326 IAC 6.5-1-2 Allowable PM (lbs/hr) = (0.03 gr/dscf) * Flow Rate (scfm) * (60 min/hr) * (1 lb/7000 gr)
Potential Grain Loading Before Control (grain/dscf) = Captured/Uncontrolled PM PTE (lbs/hr) * (1 / flow rate in scfm) * (1 hr / 60 min) * (7000 grains/lb)
Potential Grain Loading After Control (grain/dscf) = Captured/Controlled PM PTE (lbs/hr) * (1 / flow rate in scfm) * (1 hr / 60 min) * (7000 grains/lb)

Appendix A: Emission Calculations
Advanced Recycling Center (ARC) Fugitive Dust Emissions - Paved Roads

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Maximum MSW Processing Rate (tons/hr)	50.00	tons/hr	
Maximum Recycled Material Processing Rate (tons/hr)	11.34	tons/hr	Source estimates that approximately 24% of the material processed by the ARC will be recycleable.
Maximum Fines Material Processing Rate (tons/hr)	7.50	tons/hr	Source estimates that approximately 15% of the material processed by the ARC will be fines.

Process	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per day (trip/day)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)*	Maximum one-way distance (miles/trip)	Maximum one-way miles (miles/yr)
MSW packer truck entering site full	19.0	8.0	27.0	1.5E+02	5.5E+04	1.5E+06	2566	0.49	26607.7
MSW packer truck leaving site empty	19.0	0.0	19.0	1.5E+02	5.5E+04	1.0E+06	2566	0.49	26607.7
Recycled material trailer truck leaving site full	17.0	15.0	32.0	1.8E+01	6.6E+03	2.1E+05	1368	0.26	1715.4
Recycled material trailer truck entering site empty	17.0	0.0	17.0	1.8E+01	6.6E+03	1.1E+05	1368	0.26	1715.4
Fines material trailer truck leaving site full	17.0	15.0	32.0	1.2E+01	4.4E+03	1.4E+05	2695	0.51	2235.6
Fines material trailer truck entering site empty	17.0	0.0	17.0	1.2E+01	4.4E+03	7.4E+04	2695	0.51	2235.6
	Total			**360**	**131,506**	**3,057,657**			**61,117**

Average Vehicle Weight Per Trip =	23.3	tons/trip
Average Miles Per Trip =	0.465	miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	23.3	23.3	23.3	tons = average vehicle weight (provided by source)
sL =	7.4	7.4	7.4	g/m^2 = silt loading value for paved roads at municipal solid waste landfills - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)]
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]

where p =	125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =	365	days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.6833	0.3367	0.0826	lb/mile
Mitigated Emission Factor, Eext =	1.5392	0.3078	0.0756	lb/mile
Dust Control Efficiency =	88%	88%	88%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
MSW packer truck entering site full	22.39	4.48	1.10	20.48	4.10	1.01	2.46	0.49	0.12
MSW packer truck leaving site empty	22.39	4.48	1.10	20.48	4.10	1.01	2.46	0.49	0.12
Recycled material trailer truck leaving site full	1.44	0.29	0.07	1.32	0.26	0.06	0.16	0.03	0.01
Recycled material trailer truck entering site empty	1.44	0.29	0.07	1.32	0.26	0.06	0.16	0.03	0.01
Fines material trailer truck leaving site full	1.88	0.38	0.09	1.72	0.34	0.08	0.21	0.04	0.01
Fines material trailer truck entering site empty	1.88	0.38	0.09	1.72	0.34	0.08	0.21	0.04	0.01
	51.44	**10.29**	**2.53**	**47.04**	**9.41**	**2.31**	**5.64**	**1.13**	**0.28**

Methodology
Maximum Weight of Vehicle and Load (tons/trip) = [Maximum Weight of Vehicle (tons/trip)] + [Maximum Weight of Load (tons/trip)]
Maximum trips per day (trips/day) = [Maximum Material Processing Rate (tons/hr)] / [Maximum Weight of Load (tons/trip)] * [24 hours/day]
Maximum trips per year (trip/yr) = [Maximum trips per day (trips/day)] * [365 days/year]
Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (tons/trip)] * [Maximum trips per year (trip/yr)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emission Calculations
Advanced Recycling Center (ARC)
Mercury (Hg)

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

The Indianapolis Resource Recovery Facility (IRRF) currently processes MSW which includes mercury containing devices such as fluorescent tubes and compact fluorescent lamps (CFL). The MSW (including mercury containing waste) is directed to the combustion units which are equipped with mercury emissions control systems. The ARC project will result in the mercury containing MSW being sorted to recover recyclable materials prior to combustion. The recovery operation could result in mercury containing devices being broken resulting in emissions of mercury vapor.

A) Estimate the annual average Mercury (Hg) contained in MSW received at the Facility.

Assume that all mercury being emitted from the combustion units is from fluorescent bulbs.

MSW Combustion Unit	Tested Hg Emission Rate	Removal Efficiency	Inlet Hg Emisson Rate	MSW Test Rate	Estimated Hg per ton of MSW Received
	(lb/hr)		(lb/hr)	(ton/hr)	(lb/ton)
Unit 1	7.82E-04	91.80%	9.54E-03	28.74	3.32E-04
Unit 2	3.18E-04	98.30%	1.87E-02	28.74	6.51E-04
Unit 3	5.08E-04	94.80%	9.77E-03	28.74	3.40E-04
Average					**4.41E-04**

Notes

1) Tested mercury emission rate and removal efficiency from 7/28/2014 stack test report.

2) Inlet Hg Emission Rate (lb/hr) = Tested Hg Emission Rate (lb/hr) / (1 - Removal Efficiency)

3) MSW Test Rate assumed at 95% of the 726 ton/day rate specified in Title V permit divided by 24 hours/day.

4) Estimated Hg per ton of MSW Received (lb/ton) = Inlet Hg Emission Rate (lb/hr) / MSW Test Rate (ton/hr).

B) Estimate the Mercury (Hg) emissions from the ARC.

Assume all fluorescent bulbs (linear and CFL) are broken during ARC processing. The USEPA estimates that about 11 percent of the mercury in a compact fluorescent lamp is released into air or water when it is sent to a landfill, assuming the light bulb is broken. (see note below)

	ARC Processing Rate	Estimated Hg per ton of MSW Received	Estimated Release rate to Air	Potential Operating	Hg Emission Rate	Hg Emission Rate
	ton/hr	(lb/ton)	%	(hours)	(lb/hr)	(ton/yr)
Potential to Emit	50	4.41E-04	11%	8760	2.42E-03	1.06E-02

Notes

1) Source for emission basis: Cain, A., S. Disch, C. Twaroski, J. Reindl, C. R. Case. Substance Flow Analysis of Mercury Intentionally Used in Products in the United States. Journal of Industrial Ecology. Volume 11, Issue 3, ages 61–75, July 2007.

2) Hg Emission Rate (lb/hr) = ARC Processing Rate (ton/hr) * Estimated Hg per ton of MSW Received (lb/ton) * 11% Estimated Release rate to Air

3) Hg Emission Rate (ton/yr) = Hg Emission Rate (lb/hr) * 8760 (hr/yr) * 1/2000 (ton/lbs)

Appendix A: Emission Calculations
MSW Incinerator Fugitive Dust Emissions - Paved Roads

Company Name: Covanta Indianapolis, Inc.
Source Address: 2320 S. Harding Street, Indianapolis, IN 46221
Significant Source Modification No.: 097-35573-00123
Significant Permit Modification No.: 097-35639-00123
Reviewer: Jenny Liljegren/David Matousek

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

The Indianapolis Resource Recovery Facility (IRRF) has three (3) combustors, each with a rated capacity of 726 tons MSW /day. The source estimates that approximately 26% of the combusted MSW is trucked off site as ash.

Maximum MSW Processing Rate of IRRF	726	tons/day per unit
Maximum Annual IRRF MSW Processing Rate	794970	tons/year
Daily IRRF Receiving Rate	2178	tons/day
Maximum Ash production rate of IRRF	189	tons/day per unit
Maximum Annual IRRF Ash Production Rate	206692	tons/year
Daily IRRF Ash Production Rate	566	tons/day

Process	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per day (trip/day)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)*	Maximum one-way distance (miles/trip)	Maximum one-way miles (miles/yr)
MSW packer truck entering site full	19.0	8.0	27.0	2.7E+02	9.9E+04	2.7E+06	2000	0.38	37640.6
MSW packer truck leaving site empty	19.0	0.0	19.0	2.7E+02	9.9E+04	1.9E+06	2000	0.38	37640.6
Ash Truck entering site empty	19.0	0.0	19.0	3.5E+01	1.3E+04	2.5E+05	2000	0.38	4893.3
Ash Truck leaving site full	19.0	16.0	35.0	3.5E+01	1.3E+04	4.5E+05	2000	0.38	4893.3
	Total			**615**	**224,579**	**5,268,664**			**85,068**

Average Vehicle Weight Per Trip = 23.5 tons/trip
Average Miles Per Trip = 0.379 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	23.5	23.5	23.5	tons = average vehicle weight (provided by source)
sL =	7.4	7.4	7.4	g/m^2 = silt loading value for paved roads at municipal solid waste landfills - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)]
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.6988	0.3398	0.0834	lb/mile
Mitigated Emission Factor, Eext =	1.5533	0.3107	0.0763	lb/mile
Dust Control Efficiency =	88%	88%	88%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
MSW packer truck entering site full	31.97	6.39	1.57	29.23	5.85	1.44	3.51	0.70	0.17
MSW packer truck leaving site empty	31.97	6.39	1.57	29.23	5.85	1.44	3.51	0.70	0.17
Ash Truck entering site empty	4.16	0.83	0.20	3.80	0.76	0.19	0.46	0.09	0.02
Ash Truck leaving site full	4.16	0.83	0.20	3.80	0.76	0.19	0.46	0.09	0.02
	72.25	**14.45**	**3.55**	**66.07**	**13.21**	**3.24**	**7.93**	**1.59**	**0.39**

Methodology
Maximum Weight of Vehicle and Load (tons/trip) = [Maximum Weight of Vehicle (tons/trip)] + [Maximum Weight of Load (tons/trip)]
Maximum trips per day (trips/day) = [Maximum Material Processing Rate (tons/hr)] / [Maximum Weight of Load (tons/trip)] * [24 hours/day]
Maximum trips per year (trip/yr) = [Maximum trips per day (trips/day)] * [365 days/year]
Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (tons/trip)] * [Maximum trips per year (trip/yr)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 7, 2015

Mr. Brian Foster
Covanta Indianapolis
2320 S Harding St
Indianapolis, IN 46221

Re: Public Notice
Covanta Indianapolis
Permit Level: Title V - Significant Source Modification & Title V - Significant Permit Modification
Permit Number: 097 - 35573 - 00123 & 097 - 35639 - 00123

Dear Mr. Foster:

Enclosed is a copy of your draft Title V - Significant Source Modification & Title V - Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Indianapolis Star in Indianapolis, IN publish the abbreviated version of the public notice no later than August 11, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the West Indianapolis Library Branch, 1216 South Kappes St. in Indianapolis IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to David Matousek, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-8253 or dial (317) 232-8253.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover lette-2014. Dot4/10/14

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Governor

Thomas W. Easterly
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 7, 2015

Indianapolis Star
Attn: Classifieds
130 S. Meridian St.
Indianapolis, Indiana 46225

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Covanta Indianapolis, Marion County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 11, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: Title V - Significant Source Modification & Title V - Significant Permit Modification
Permit Number: 097 - 35573 - 00123 & 097 - 35639 - 00123

Enclosure
PN Newspaper.dot 6/13/2013

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 7, 2015

To: West Indianapolis Library Branch 1216 South Kappes St. Indianapolis IN

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Covanta Indianapolis
Permit Number: 097 - 35573 - 00123 & 097 - 35639 - 00123

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 6/13/2013

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Notice of Public Comment

August 7, 2015
Covanta Indianapolis
097 - 35573 - 00123 & 097 - 35639 - 00123

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 6/13/13

Mail Code 61-53

IDEM Staff	LPOGOST 8/7/2015 Covanta Indianapolis, Inc. 097 - 35573 - 00123 & 097 - 35639 - 00123 (draft		
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: **CERTIFICATE OF MAILING ONLY**

AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING

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		Brian Foster Covanta Indianapolis, Inc. 2320 S Harding St Indianapolis IN 46221 (Source CAATS)									
2		Joseph Miller Facility Manager Covanta Indianapolis, Inc. 2320 S Harding St Indianapolis IN 46221 *(RO CAATS)*									
3		Ms. Suzzette Carter 3534 6th Avenue Indianapolis IN 46221 *(Affected Party)*									
4		Ms. Elaine Gregg 7328 Mendenhall Rd Camby IN 46113 *(Affected Party)*									
5		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 *(Health Department)*									
6		Mr. Mark Raker 1500 N Ritter Ave Indianapolis IN 46219 *(Affected Party)*									
7		Mr. Nick Hess Alliance for Democracy P.O. Box 34133 Indianapolis IN 46234 *(Affected Party)*									
8		Mr. Glenn Pratt 8460 Spring Mill Court Indianapolis IN 46260 *(Affected Party)*									
9		Wilie May Cooley 3076 Davis Drive Indianapolis IN 46221 *(Affected Party)*									
10		E. Broading 4468 Moller Road Indianapolis IN 46254 *(Affected Party)*									
11		Mr. Sam H. Jones 777 Indiana Avenue Indianapolis IN 46204 *(Affected Party)*									
12		Ms. Angie Nussmeer 200 E. Washington Street, Suite 2460 Indianapolis IN 46204 *(Affected Party)*									
13		Cornell Burris 4345 Ashbourne Indianapolis IN 46226 (Affected Party)									
14		Ms. Patricia Miller 1041 S. Muesing Rd Indianapolis IN 46239-9186 *(Legislator)*									
15		West Indianapolis Library Branch 1216 South Kappes St. Indianapolis IN 46221 *(Library)*									

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

FACSIMILIE OF PS Form 3877

Mail Code 61-53

IDEM Staff	LPOGOST 8/7/2015 Covanta Indianapolis, Inc. 35573 (draft/final)		
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: **CERTIFICATE OF MAILING ONLY**

AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING

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		Ray 3509 6th Avenue Indianapolis IN 46221 (Affected Party)									
2		Mr. Robert Frye 3501 Carr Avenue Indianapolis IN 46221 *(Affected Party)*									
3		Taylor L. Baker 5413 Redberry Ct. Indianapolis IN 46254 *(Affected Party)*									
4		Indianapolis City Council 200 East Washington Street, Room E Indianapolis IN 46204 *(Local Official)*									
5		Lawrence City Council and Mayors Office 9001 East 59th Street #205 Lawrence IN 46216 *(Local Official)*									
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 *(Local Official)*									
7		Edward Rhondes 4999 East Stae Rd. 46 Bloomington IN 47401 *(Affected Party)*									
8		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 *(Local Official)*									
9		Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 *(Affected Party)*									
10		Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 *(Affected Party)*									
11		Chris White AECOM 800 LaSalle Avenue, Suite 500 Minneapolis MN 55402 *(Consultant)*									
12											
13											
14											
15											

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