



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

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Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Clark-Floyd Landfill in Clark County

Significant Source Modification No.: 019-36828-00097

Significant Permit Modification No.: 019-36988-00097

The Indiana Department of Environmental Management (IDEM) has received an application from Clark-Floyd Landfill, located at 14304 SR 60, Borden, IN 47106, for a significant modification of its Part 70 Operating Permit issued on July 3, 2014. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Clark-Floyd Landfill to make certain changes at its existing source. Clark-Floyd Landfill, has applied for the addition of a new landfill gas flare, removal of its existing landfill gas flare, and update the permit to include the requirements of 40 CFR 61, Subpart M since the source is an active waste disposal site that receives asbestos-containing waste material.

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

Borden Library
117 West Main St.
Borden, IN 47106

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

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 019-36828-00097 and SPM 019-36988-00097 in all correspondence.

Comments should be sent to:

Adam Wheat
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-8397
Or dial directly: (317) 233-8397
Fax: (317) 232-6749 attn: Adam Wheat
E-mail: awheat@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, at the IDEM Regional Office 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 Adam Wheat of my staff at the above address.



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



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Mr. Robert Lee
Clark-Floyd Landfill, LLC
6108 Sable Mill Court
Jeffersonville, IN 47130

Re: 019-36828-00097
Significant Source Modification

Dear Mr. Lee:

Clark-Floyd Landfill was issued Part 70 Operating Permit Renewal No. T019-33893-00097 on July 3, 2014 for a stationary municipal solid waste landfill located at 14304 SR 60, Borden, IN 47106. An application to modify the source was received on February 15, 2016. 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 unit is approved for construction at the source:

- (a) One (1) flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]

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.

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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).

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 Adam Wheat 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 Adam Wheat or extension 3-8397 or dial (317) 233-8397.

Sincerely,

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

Attachments: Significant Source Modification and Technical Support Document

cc: File - Clark County
Clark County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Southeast Regional Office



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Significant Source Modification to a Part 70 Source

OFFICE OF AIR QUALITY

**Clark-Floyd Landfill
14304 SR 60
Borden, Indiana 47106**

(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 new and/or 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. 019-36828-00097	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date:

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Attachment B – 40 CFR 63, Subpart AAAA (National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills)

Attachment C – 40 CFR 60, Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills)

Attachment D - 40 CFR 61, Subpart M (National Emission Standard for Asbestos)

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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, A.3, and A.4 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 operates a stationary municipal solid waste landfill that is owned by Clark County and Floyd County.

Source Address:	14304 SR 60, Borden, Indiana 47106
General Source Phone Number:	(812) 246-9755
SIC Code:	4953 (Refuse Systems)
County Location:	Clark, Carr Township
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories Greenhouse Gas (GHG) potential to emit (PTE) is less than one hundred thousand (100,000) tons of CO ₂ equivalent (CO ₂ e) emissions per year.

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This source consists of a municipal solid waste landfill with a collocated landfill gas generation station:

- (a) Clark-Floyd Landfill (Source ID # 019-00097), the primary operation, is located at 14304 State Road 60, Borden, Indiana, and
- (b) Clark-Floyd Landfill Gas Generating Station (Source ID # 019-00124), the supporting operation, is located at 14304 State Road 60, Borden, Indiana.

IDEM has determined that Clark-Floyd Landfill and Clark-Floyd Landfill Gas Generating Station are located on contiguous properties, have the same two-digit SIC code (Major Group 49: Electric, Gas, And Sanitary Services), and the Clark-Floyd Landfill Gas Generating Station is dependent wholly upon the output (landfill gas) of the Clark-Floyd Landfill for its operation. Therefore, Clark-Floyd Landfill Gas Generating Station and Clark-Floyd Landfill will be considered as one source, as defined by 326 IAC 2-7-1(22), based on this business relationship.

Separate Part 70 Operating Permits will be issued to the Clark-Floyd Landfill and the Clark-Floyd Landfill Gas Generating Station solely for administrative purposes. This conclusion was initially determined under Administrative Part 70 Operating Permit T 019-24153-00124 on July 20, 2007.

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A.3 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) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970. [40 CFR 60, Subpart WWW] [40 CFR, 61 Subpart M] [40 CFR 63, Subpart AAAA]
- (b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]

A.4 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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

- (a) 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. [326 IAC 8-9-6]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6.5] [326 IAC 6-4]

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).

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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.

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, T019-33893-00097, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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.

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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

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- (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.

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

- (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.

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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.

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- (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 T019-33893-00097 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.

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).

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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

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- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

- (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;

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(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).

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- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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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.

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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.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 A to the operating permit. The provisions of 326 IAC 6-5 are not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

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- (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.

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

C.7 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.8 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.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 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.11 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.12 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.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 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(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

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The statement must be submitted to:

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

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

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

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

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

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

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring

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Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]

Insignificant Activities:

- (a) 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. [326 IAC 8-9-6]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6.5] [326 IAC 6-4]

(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 Volatile Organic Liquid Storage [326 IAC 8-9]

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), the Permittee of each vessel subject to this rule shall:

- (a) Keep all records required by 326 IAC 8-9-6 for three (3) years unless specified otherwise. Records required by 326 IAC 8-9-6(b) shall be maintained for the life of the vessel.
- (b) Maintain records containing the following information for each vessel:
 - (1) The vessel identification number.
 - (2) The vessel dimensions.
 - (3) The vessel capacity.

D.1.2 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), Particulate Matter Limitations Except Lake County, particulate matter (PM) emissions from the flare and the paved and unpaved roads and parking lots with public access shall not exceed 0.03 grain per dry standard cubic foot.

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SECTION E.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970. [40 CFR 60, Subpart WWW] [40 CFR, 61 Subpart M] [40 CFR 63, Subpart AAAA]
- (b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]

(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) [40 CFR 60, Subpart A] [326 IAC 12]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the municipal solid waste landfill and flare except when otherwise specified in 40 CFR 60, Subpart WWW.

E.1.2 New Source Performance Standards (NSPS) [40 CFR 60, Subpart WWW] [326 IAC 12] [326 IAC 8-8]

Pursuant to 40 CFR 60 Subpart WWW and 326 IAC 8-8 (Municipal Solid Waste Landfills Located in Clark, Floyd, Lake, and Porter Counties), the Permittee shall comply with the following provisions of 40 CFR 60 Subpart WWW (included as Attachment C to the operating permit), which are incorporated as 326 IAC 12, for the municipal solid waste landfill and flare:

- (1) 40 CFR 60.750;
- (2) 40 CFR 60.751;
- (3) 40 CFR 60.752;
- (4) 40 CFR 60.753;
- (5) 40 CFR 60.754;
- (6) 40 CFR 60.755;
- (7) 40 CFR 60.756;
- (8) 40 CFR 60.757;
- (9) 40 CFR 60.758; and
- (10) 40 CFR 60.759.

E.1.3 Clarification of 40 CFR 60.753

- (a) Pursuant to 40 CFR 60.753(d), the Permittee shall operate the collection system so that the methane concentration at the surface of the landfill is less than 500 ppm above background concentration.
- (b) Pursuant to 40 CFR 60.753(e) and (f), the Permittee shall operate the collection system so that collected landfill gas is vented to a control system designed and operated in compliance with 40 CFR 60.752(b)(2)(iii) and the control system is operated at all times the collected gas is routed to the control system. The Permittee may also vent collected landfill gas to a treatment system consisting of filtration to remove particles down to 0.1 micron and the landfill gas is dewatered and compressed for beneficial reuse. After treatment, the landfill gas system is no longer subject to the provisions of 40 CFR 60, Subpart WWW.

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- (c) If collected and untreated landfill gas cannot be vented to the control system or to the landfill gas treatment system due to collection system and/or control system failure, the Permittee shall immediately shut down the gas mover system and all valves in the collection and control system contributing to venting of untreated landfill gas to the atmosphere shall be closed within one hour pursuant to 40 CFR 60.753(e).

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SECTION E.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970. [40 CFR 60, Subpart WWW] [40 CFR, 61 Subpart M] [40 CFR 63, Subpart AAAA]
- (b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]

(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 (NESHAP) [40 CFR 63, Subpart A] [326 IAC 12]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the municipal solid waste landfill and flare except when otherwise specified in 40 CFR 63, Subpart AAAA.

E.2.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR 63, Subpart AAAA] [326 IAC 12]

Pursuant to 40 CFR 63 Subpart AAAA, the Permittee shall comply with the following provisions of 40 CFR 63 Subpart AAAA (included as Attachment B to the operating permit), which are incorporated as 326 IAC 12, for the municipal solid waste landfill and flare:

- (1) 40 CFR 63.1930;
- (2) 40 CFR 63.1935;
- (3) 40 CFR 63.1940;
- (4) 40 CFR 63.1945;
- (5) 40 CFR 63.1947;
- (6) 40 CFR 63.1950;
- (7) 40 CFR 63.1952;
- (8) 40 CFR 63.1955;
- (9) 40 CFR 63.1960;
- (10) 40 CFR 63.1965;
- (11) 40 CFR 63.1975;
- (12) 40 CFR 63.1980;
- (13) 40 CFR 63.1985;
- (14) 40 CFR 63.1990; and
- (15) Table 1 to Subpart AAAA of Part 63.

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SECTION E.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970. [40 CFR 60, Subpart WWW] [40 CFR, 61 Subpart M] [40 CFR 63, Subpart AAAA]

(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.3.1 General Provision Relating to National Emission Standards for Hazardous Air Pollutants [326 IAC 14-1] [40 CFR 61, Subpart A]

- (a) Pursuant to 40 CFR 61.01, the Permittee shall comply with the provisions of 40 CFR Part 61 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 14-1 for the landfill except as otherwise specified in 40 CFR Part 61, Subpart A.
- (b) Pursuant to 40 CFR 61.04(b)(P), the Permittee shall submit all required notifications and reports to:

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

E.3.2 National Emission Standard for Asbestos [40 CFR 61, Subpart M] [326 IAC 14-2]

Pursuant to 40 CFR 61 Subpart M, the Permittee shall comply with the following provisions of National Emission Standard for Asbestos (included as Attachment D of the operating permit), which are incorporated by reference as 326 IAC 14-2, for the landfill:

- (1) 40 CFR 61.140;
- (2) 40 CFR 61.141;
- (3) 40 CFR 61.153;
- (4) 40 CFR 61.154;
- (5) 40 CFR 61.156; and
- (6) 40 CFR 61.157.

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

Source Name: Clark-Floyd Landfill
Source Address: 14304 SR 60, Borden, Indiana 47106
Part 70 Permit No.: T019-33893-00097

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:

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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: Clark-Floyd Landfill
Source Address: 14304 SR 60, Borden, Indiana 47106
Part 70 Permit No.: T019-33893-00097

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) daytime 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:

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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: _____

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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: Clark-Floyd Landfill
Source Address: 14304 SR 60, Borden, Indiana 47106
Part 70 Permit No.: T019-33893-00097

Months: _____ to _____ Year: _____

Page 1 of 2

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:

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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: _____

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

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

Source Description and Location

Source Name:	Clark-Floyd Landfill
Source Location:	14304 SR 60, Borden, IN 47106
County:	Clark
SIC Code:	4953 (Refuse Systems)
Operation Permit No.:	T019-33893-00097
Operation Permit Issuance Date:	July 3, 2014
Significant Source Modification No.:	019-36828-00097
Significant Permit Modification No.:	019-36988-00097
Permit Reviewer:	Adam Wheat

Source Definition

This source definition from the Administrative Part 70 Operating Permit was incorporated into this permit as follows:

This source consists of a municipal solid waste landfill with a collocated landfill gas generation station:

- (a) Clark-Floyd Landfill (Source ID # 019-00097), the primary operation, is located at 14304 State Road 60, Borden, Indiana, and
- (b) Clark-Floyd Landfill Gas Generating Station (Source ID # 019-00124), the supporting operation, is located at 14304 State Road 60, Borden, Indiana.

IDEM has determined that Clark-Floyd Landfill and Clark-Floyd Landfill Gas Generating Station are located on contiguous properties, have the same two-digit SIC code (Major Group 49: Electric, Gas, And Sanitary Services), and the Clark-Floyd Landfill Gas Generating Station is dependent wholly upon the output (landfill gas) of the Clark-Floyd Landfill for its operation. Therefore, Clark-Floyd Landfill Gas Generating Station and Clark-Floyd Landfill will be considered as one source, as defined by 326 IAC 2-7-1(22), based on this business relationship.

Separate Part 70 Operating Permits will be issued to the Clark-Floyd Landfill and the Clark-Floyd Landfill Gas Generating Station solely for administrative purposes. This conclusion was initially determined under Administrative Part 70 Operating Permit T 019-24153-00124 on July 20, 2007.

Existing Approvals

The source was issued Part 70 Operating Permit No. T019-33893-00097 on July 3, 2014. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Clark County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .
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 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

- (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. Clark 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}**
 Clark County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (c) **Other Criteria Pollutants**
 Clark County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Note: The landfill is subject to 40 CFR 61, Subpart M; however, landfills were not subject to this NSPS until after August 7, 1980.

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	9.66
PM ₁₀	9.66
PM _{2.5}	9.66
SO ₂	5.91
NO _x	53.86
VOC	51.29
CO	176.94
Total HAPs	3.21
Highest Single HAP	3.00 (HCl)

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 not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area 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 Clark-Floyd Landfill on February 15, 2016, relating to the addition of a new landfill gas flare, removal of its existing landfill gas flare, and update the permit to include the requirements of 40 CFR 61, Subpart M since the source is an active waste disposal site that receives asbestos-containing waste material. The following is a list of the proposed emission unit and pollution control device:

- (a) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

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

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	6.23
PM ₁₀	6.23
PM _{2.5}	6.23
SO ₂	6.06
VOC	0.80
CO	167.73
NO _x	30.83
Single HAPs	<10
Total HAPs	<25

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

This source modification is subject to 326 IAC 2-7-10.5(g)(4) and (7), because the potential to emit nitrogen oxides (NO_x) is greater than twenty-five (25) tons per year and the potential to emit carbon monoxide (CO) is greater than one hundred (100) tons per year. 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 does not qualify as an administrative amendment or as a minor permit modification.

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.

Process / Emission Unit	Project Emissions (ton/yr)						
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO
New Backup Flare	6.23	6.23	6.23	6.32	30.83	0.80	167.73
Total for Modification	6.23	6.23	6.23	6.06	30.83	0.80	167.73
PSD Major Source Thresholds	250	250	250	250	250	250	250
Emission Offset Major Source Thresholds	---	---	100	---	---	---	---

*PM_{2.5} listed is direct PM_{2.5}.

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 modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This modification to an existing minor Emission Offset stationary source is not major because the emissions increase of PM_{2.5} is less than the Emission Offset major source thresholds. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

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

NSPS:

- (a) The source is subject to the Standards of Performance for Municipal Solid Waste Landfills (40 CFR 60.750, Subpart WWW), which is incorporated by reference as 326 IAC 12. This source, a municipal solid waste landfill that commenced construction, reconstruction, or modification on or after May 30, 1991 shall comply with the following provisions of 40 CFR 60, Subpart WWW, except for approved variances incorporated into the collection and control design plan pursuant to 40 CFR 60, Subpart WWW. The emission units subject to this rule, due to this modification, are:
 - (a) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970 and modified in 2011. [40 CFR 60, Subpart WWW] [40 CFR, 61 Subpart M] [40 CFR 63, Subpart AAAA]
 - (b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]

Pursuant to 40 CFR 60 Subpart WWW, the Permittee shall comply with the provisions of 40 CFR 60 Subpart WWW, which are incorporated as 326 IAC 12-1 for the new flare, as follows:

- (1) 40 CFR 60.750;
 - (2) 40 CFR 60.751;
 - (3) 40 CFR 60.752;
 - (4) 40 CFR 60.753;
 - (5) 40 CFR 60.754;
 - (6) 40 CFR 60.755;
 - (7) 40 CFR 60.756;
 - (8) 40 CFR 60.757;
 - (9) 40 CFR 60.758; and
 - (10) 40 CFR 60.759.
- (b) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

- (c) The source is subject to the requirements of the National Emission Standard for Asbestos (40 CFR 61.154, Subpart M), which is incorporated by reference as 326 IAC 14-2. This source is an active waste disposal site that receives asbestos-containing waste material from a source covered under 40 CFR 61.149, 61.150, or 61.155 of this Subpart. The emission units subject to this rule, due to this modification, are:
- (a) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970. [40 CFR 60, Subpart WWW] [40 CFR, 61 Subpart M] [40 CFR 63, Subpart AAAA]

Non applicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart M:

- (1) 40 CFR 61.140;
- (2) 40 CFR 61.141;
- (3) 40 CFR 61.153;
- (4) 40 CFR 61.154;
- (5) 40 CFR 61.156; and
- (6) 40 CFR 61.157.

The provisions of 40 CFR 61, Subpart A – General Provisions, which are incorporated as 326 IAC 14-1, apply to the facility described in this section except when otherwise specified in 40 CFR 61, Subpart M.

- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills (40 CFR 63.1930, Subpart AAAA), which is incorporated by reference as 326 IAC 20-67. The Permittee who operates a stationary municipal solid waste landfill that has accepted waste since November 8, 1987 and has a design capacity equal to or greater than 2.5 million megagrams shall comply with 40 CFR 63, Subpart AAAA. The emission units subject to this rule, due to this modification, are:
- (a) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970. [40 CFR 60, Subpart WWW] [40 CFR, 61 Subpart M] [40 CFR 63, Subpart AAAA]
- (b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR

63, Subpart AAAAA] [326 IAC 6.5]

Pursuant to 40 CFR 63 Subpart AAAAA, the Permittee shall comply with the provisions of 40 CFR 63 Subpart AAAAA, which are incorporated as 326 IAC 12-1 for the municipal solid waste landfill and flare, as specified as follows:

- (1) 40 CFR 63.1930;
- (2) 40 CFR 63.1935;
- (3) 40 CFR 63.1940;
- (4) 40 CFR 63.1945;
- (5) 40 CFR 63.1947;
- (6) 40 CFR 63.1950;
- (7) 40 CFR 63.1952;
- (8) 40 CFR 63.1955;
- (9) 40 CFR 63.1960;
- (10) 40 CFR 63.1965;
- (11) 40 CFR 63.1975;
- (12) 40 CFR 63.1980;
- (13) 40 CFR 63.1985;
- (14) 40 CFR 63.1990; and
- (15) Table 1 to Subpart AAAAA of Part 63.

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the municipal solid waste landfill and flare except when otherwise specified in 40 CFR 63, Subpart AAAAA.

- (b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

CAM :

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

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

CAM Applicability Analysis							
Emission Unit/ 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)
Flare/PM	N	Y	6.23	6.23	100	N	N
Flare/NOx	N	N	30.83	30.83	100	N	N
Flare/CO	N	N	167.73	167.73	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the new landfill gas flare as part of this modification.

State Rule Applicability Determination

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

- (a) 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.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the new flare 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.
- (c) 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, 2018, 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.
- (d) 326 IAC 2-7-6(5) (Annual Compliance Certification)
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.
- (e) 326 IAC 6.5 (PM Limitations Except Lake County)
This rule applies to sources locate in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne Counties, with the potential to emit of ten (10) tons per year or more of particulate matter (PM). This rule also applies to sources specifically listed in 326 IAC 6.5-2 through 6.5-10. When fugitive emissions are included, this source, located in Clark County, has the potential to emit greater than 10 tons per year of PM. Therefore, this rule applies to the source, since the potential to emit PM is not limited to less than 10 tons per year.

Since the source is subject to 326 IAC 6.5 PM emissions from the new landfill gas flare shall not exceed 0.03 grain per dry standard cubic foot (dscf).
- (f) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
This rule applies to all emission units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. The new landfill gas flare has a potential to emit SO₂ of less than 25 tons per year and less than 10 pounds per hour. Therefore, 326 IAC 7-1.1 does not apply to the new landfill gas flare.
- (g) 326 IAC 8-1-6 (New Facilities; general reduction requirements)
This rule applies to new facilities as of January 1, 1980 that have potential emissions of twenty-five (25) tons per year or more of VOC, are located anywhere in the state and are not otherwise regulated under another 326 IAC 8 rule, 326 IAC 20-48 or 326 IAC 20-56. The new landfill gas flare has potential VOC emissions of less than 25 tons per year and is subject to 326 IAC 8-8 (Municipal Solid Waste Landfills Located in Clark, Floyd, Lake, and Porter Counties). Therefore, 326 IAC 8-1-6 does not apply.

- (h) 326 IAC 8-8 (Municipal Solid Waste Landfills Located in Clark, Floyd, Lake, and Porter Counties)
This rule applies to new and existing municipal solid waste landfills located in Clark, Floyd, Lake, and Porter Counties, emitting greater than 55 tons of non-methane organic compounds (NMOC) and have a minimum design capacity of 100,000 megagrams (Mg) of solid waste. This landfill is subject to 326 IAC 8-8, since it is located in Clark County, has the potential to emit greater than 55 tons per year of NMOC, and has a minimum design capacity greater than 100,000 Mg. The source complies with the requirements of 326 IAC 8-8 by complying with 40 CFR 60, Subpart WWW. Since this landfill must comply with the requirements of 326 IAC 8-8 and 40 CFR 60, Subpart WWW, the new landfill flare must also comply with these rules.
- (i) 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)
This rule applies to any facility located in Clark or Floyd County, constructed before 1997, and with the potential to emit NO_x of greater than equal to forty (40) tons per year. This modification will not cause the source wide PTE of NO_x to exceed forty (40) tons per year. Therefore this source is not subject to the requirements of 326 IAC 10.

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.

New compliance determination and monitoring requirements applicable per 40 CFR Part 61, Subpart M are added as Section E.3 of the permit as shown in the Proposed Changes section below. Changes to the compliance determination and monitoring requirements are detailed in the Proposed Changes section of this document.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 019-33893-00097 Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

- (a) The new landfill gas flare has been added to the permit.
- (b) The requirements of 40 CFR 61, Subpart M have been added to the permit as Section E.3.
- (c) Section A.1 of the permit has been revised to clarify that the Permittee operates the source and that Clark and Floyd Counties own the source.
- (d) Section A.3(a) has been updated to include the modification date of the solid waste landfill that occurred in 2011.
- (e) Condition E.1.3 has been added to clarify the Permittees requirements regarding the above-ground methane concentration, the sources requirement to vent collected landfill gas to a control device, and procedures for when landfill gas cannot be vented to a control system.

- (f) Condition C.5 and Sections E.1 and E.2 are revised to clarify that the federal rule is attached to the operating permit.
- (g) 326 IAC 2-7-16 states that the Permittee must notify IDEM within "four (4) daytime business hours" for emergencies. The Emergency Occurrence Report Form lacked the word 'daytime'. 'Daytime' is being added to be consistent with the rule.

The permit has been revised as follows, with deleted language as ~~strikethrough~~ text and new language as **bold** text:

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 landfill.~~ **The Permittee operates a stationary municipal solid waste landfill that is owned by Clark County and Floyd County.**

A.3 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) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970 **and modified in 2011**. [40 CFR 60, Subpart WWW] **[40 CFR, 61 Subpart M]** [40 CFR 63, Subpart AAAA]
- (b) ~~One (1) flare rated at 1,700 standard cubic feet per minute to control landfill gas emissions, constructed in 1999. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]~~
- (b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]**

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 A **to the operating permit**. The provisions of 326 IAC 6-5 are not federally enforceable.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- ~~(b) One (1) flare rated at 1,700 standard cubic feet per minute to control landfill gas emissions, constructed in 1999. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]~~
- (b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]**

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams

(Mg), constructed in 1970 **and modified in 2011**. [40 CFR 60, Subpart WWW] **[40 CFR, 61 Subpart M]** [40 CFR 63, Subpart AAAA]

~~(b) One (1) flare rated at 1,700 standard cubic feet per minute to control landfill gas emissions, constructed in 1999. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]~~

(b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]

E.1.2 New Source Performance Standards (NSPS) [40 CFR 60, Subpart WWW]
[326 IAC 12] [326 IAC 8-8]

Pursuant to 40 CFR 60 Subpart WWW and 326 IAC 8-8 (Municipal Solid Waste Landfills Located in Clark, Floyd, Lake, and Porter Counties), the Permittee shall comply with the following provisions of 40 CFR 60 Subpart WWW (included as Attachment C to the **operating** permit), which are incorporated as 326 IAC 12, for the municipal solid waste landfill and flare:

E.1.3 Clarification of 40 CFR 60.753

- (a) Pursuant to 40 CFR 60.753(d), the Permittee shall operate the collection system so that the methane concentration at the surface of the landfill is less than 500 ppm above background concentration.
- (b) Pursuant to 40 CFR 60.753(e) and (f), the Permittee shall operate the collection system so that collected landfill gas is vented to a control system designed and operated in compliance with 40 CFR 60.752(b)(2)(iii) and the control system is operated at all times the collected gas is routed to the control system. The Permittee may also vent collected landfill gas to a treatment system consisting of filtration to remove particles down to 0.1 micron and the landfill gas is dewatered and compressed for beneficial reuse. After treatment, the landfill gas system is no longer subject to the provisions of 40 CFR 60, Subpart WWW.
- (c) If collected and untreated landfill gas cannot be vented to the control system or to the landfill gas treatment system due to collection system and/or control system failure, the Permittee shall immediately shut down the gas mover system and all valves in the collection and control system contributing to venting of untreated landfill gas to the atmosphere shall be closed within one hour pursuant to 40 CFR 60.753(e).

SECTION E.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970 **and modified in 2011**. [40 CFR 60, Subpart WWW] **[40 CFR, 61 Subpart M]** [40 CFR 63, Subpart AAAA]

~~(b) One (1) flare rated at 1,700 standard cubic feet per minute to control landfill gas emissions, constructed in 1999. [40 CFR 60, Subpart WWW] [40 CFR 63, Subpart AAAA] [326 IAC 6.5]~~

(b) One (1) backup open flare rated at 3,000 standard cubic feet per minute to control landfill gas emissions, approved in 2016 for construction. [40 CFR 60, Subpart WWW]

[40 CFR 63, Subpart AAAAA] [326 IAC 6.5]

**E.2.2 National Emission Standards for Hazardous Air Pollutants (NESHAP)
[40 CFR 63, Subpart AAAAA] [326 IAC 12]**

Pursuant to 40 CFR 63 Subpart AAAAA, the Permittee shall comply with the following provisions of 40 CFR 63 Subpart AAAAA (included as Attachment B to the **operating** permit), which are incorporated as 326 IAC 12, for the municipal solid waste landfill and flare:

SECTION E.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) **One (1) stationary municipal solid waste landfill with a design capacity of 8,780,694 Megagrams (Mg), constructed in 1970. [40 CFR 60, Subpart WWW] [40 CFR, 61 Subpart M] [40 CFR 63, Subpart AAAAA]**

(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.3.1 General Provision Relating to National Emission Standards for Hazardous Air Pollutants
[326 IAC 14-1] [40 CFR 61, Subpart A]**

- (a) Pursuant to 40 CFR 61.01, the Permittee shall comply with the provisions of 40 CFR Part 61 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 14-1 for the landfill except as otherwise specified in 40 CFR Part 61, Subpart A.
- (b) Pursuant to 40 CFR 61.04(b)(P), the Permittee shall submit all required notifications and reports to:

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

E.3.2 National Emission Standard for Asbestos [40 CFR 61, Subpart M] [326 IAC 14-2]

Pursuant to 40 CFR 61 Subpart M, the Permittee shall comply with the following provisions of National Emission Standard for Asbestos (included as Attachment D of the operating permit), which are incorporated by reference as 326 IAC 14-2, for the landfill:

- (1) 40 CFR 61.140;
(2) 40 CFR 61.141;
(3) 40 CFR 61.153;
(4) 40 CFR 61.154;
(5) 40 CFR 61.156; and
(6) 40 CFR 61.157.

Emergency Occurrence Report

The Permittee must notify the Office of Air Quality (OAQ), within four (4) **daytime** business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section);

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. 019-36828-00097 and Significant Permit Modification No. 019-36988-00097. 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 Adam Wheat at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.
- (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 to the Technical Support Document (TSD)
Potential to Emit Summary**

Company Name: Clark-Floyd Landfill

Address: 14304 SR 60, Borden, Indiana 47106

Operational Permit Number: T019-33893-00097

Significant Source Modification No.: 019-36828-00097

Significant Permit Modification No.: 019-36988-00097

Reviewer: Adam Wheat

Potential to Emit (ton/yr)											
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	Biogenic CO ₂ (TPY CO ₂ e)	Non-CO ₂ GHG (TPY CO ₂ e - 2013 GWPs)	Single HAP Toluene	Total HAPs
Clark-Floyd Landfill											
Landfill	0.00	0.00	0.00	0.00	20.71	4.03	0.00	22,452	204,569	3.66	10.73
Flare	6.23	6.23	6.23	6.06	0.80	167.73	30.83	(b)	(b)	0.00	3.08
Diesel Tank	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0	0	negligible	
Total Landfill	6.23	6.23	6.23	6.06	21.55	171.76	30.83	22,452	204,569	3.66	13.81
Clark-Floyd Generator Station											
LFG Engine - EU-1	1.99	1.99	1.99	0.68	5.07	19.52	10.38	4,932	25	0.00	0.34
LFG Engine - EU-2	1.99	1.99	1.99	0.68	5.07	19.52	10.38	4,932	25	0.00	0.34
LFG Engine - EU-3	2.15	2.15	2.15	1.12	4.64	42.53	15.59	9,553	49	0.00	0.56
Total Generator Station	6.13	6.13	6.13	2.48	14.78	81.57	36.35	19,418	100	0.00	1.25
Sourcewide Total (2013 Federal GWPs)	12.36	12.36	12.36	8.53	36.34	253.33	67.18	204,668		3.66	15.06
Title V Major Source Threshold	NA	100	100	100	100	100	100	100,000		10	25
PSD Major Source Threshold	250	250	NA	250	250	250	250	100,000		NA	NA
Emission Offset	NA	NA	100	NA	NA	NA	NA	NA		NA	NA

(Continued on Next Sheet)

Appendix A to the Technical Support Document (TSD)
Potential to Emit Summary
 (Continued from Previous Sheet)

Potential to Emit after Issuance (ton/yr)											
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	Biogenic CO ₂ (TPY CO ₂ e)	Non-CO ₂ GHG (TPY CO ₂ e - 2013 GWPs)	Single HAP HCL	Total HAPs
Clark-Floyd Landfill											
Landfill	0.00	0.00	0.00	0.00	0.41	0.08	0.00	22,452	4,091	0.00	0.21
Flare	6.23	6.23	6.23	6.06	0.80	167.73	30.83	40,451	152	3.08	3.08
Diesel Tank	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0	0	0.00	negligible
Total Landfill	6.23	6.23	6.23	6.06	1.25	167.81	30.83	62,903	4,243	3.08	3.29
Clark-Floyd Generator Station											
LFG Engine - EU-1	1.99	1.99	1.99	0.68	5.07	19.52	10.38	4,932	25	0.34	0.34
LFG Engine - EU-2	1.99	1.99	1.99	0.68	5.07	19.52	10.38	4,932	25	0.34	0.34
LFG Engine - EU-3	2.15	2.15	2.15	1.12	4.64	42.53	15.59	9,553	49	0.56	0.56
Total for the Generator Station	6.13	6.13	6.13	2.48	14.78	81.57	36.35	19,418	100	1.25	1.25
Sourcewide Total (2013 Federal GWPs)	12.36	12.36	12.36	8.53	16.04	249.38	67.18	4,343		4.33	4.54
PSD Major Source Threshold	250	250	NA	250	250	250	250	(c)		NA	NA
Emission Offset	NA	NA	100	NA	NA	NA	NA	NA		NA	NA

Notes:

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of non-biogenic GHGs are less than one hundred thousand (<100,000) tons of CO₂e per year, and it is not in one of the twenty-eight (28) listed source categories. If biogenic CO₂ were considered, the source-wide potential to emit GHGs is less than 100,000 TPY of CO₂e. Therefore, if biogenic CO₂ were included in the source wide potential to emit, the GHG emissions at the existing source would not be subject to regulation under PSD.
- (b) The flare can be treated as an emission unit and a control device. In terms of PM, PM₁₀, PM_{2.5}, SO₂, VOC, CO, NO_x and HAPs, IDEM is treating the flare as an emission unit. Controlled emissions are based on the maximum heat input capacity to the flare. In terms of greenhouse gas (GHG) emissions, IDEM is treating the flare as a control device. For GHGs, the Uncontrolled Potential to Emit is based on the worst case scenario where the landfill gas is not controlled. The flare will not have significant GHG emissions in the uncontrolled case, because the only emissions would be those associated with natural gas combustion by the pilot in the flare. In the controlled case, the flare will have GHG emissions from the conversion of methane to carbon dioxide during combustion of the landfill gas. These emissions are detailed on Sheets 6 and 7 of 9.
- (c) PSD applies to new sources that emit or have the potential to emit at least 100,000 TPY of CO₂e or existing sources that emit at that level and that undertake a modification that increases emissions by 75,000 TPY CO₂e, and also emit at least 100 or 250 TPY of GHGs on a mass basis.

**Appendix A to the Technical Support Document
Landfill VOC Emissions**

Company Name: Clark-Floyd Landfill

Address: 14304 SR 60, Borden, Indiana 47106

Operational Permit Number: T019-33893-00097

Significant Source Modification No.: 019-36828-00097

Significant Permit Modification No.: 019-36988-00097

Reviewer: Adam Wheat

Potential to Emit

NMOC Emissions:

IDEM, OAQ completed a computer simulation of the potential emissions from the landfill using U.S. EPA LandGEM. The model indicated peak NMOC emissions from the landfill are as follows:

70.83 Peak NMOC Emissions (TPY)

2031 Peak Year

VOC Emissions:

VOC emissions can be estimated from the NMOC emission rate using information provided in AP-42, Chapter 2.4, November 1998. IDEM, OAQ estimates VOC emissions as shown below:

NMOC in Landfill Gas	595 ppmv	(AP-42, Chapter 2.4, Table 2.4-2, November 1998)
NMOC Emission Rate	70.83 TPY	
% VOC	39.00%	(AP-42, Chapter 2.4, Table 2.4-2, Note c, November 1998)
VOC Emission Rate	27.62 TPY	

Limited Potential to Emit

VOC Emissions:

AP-42, Chapter 2.4, Paragraph 2.4.4.2 - Controlled Emissions, October 2008 indicates approximately 75% of the VOC generated in the landfill is captured, 25% is fugitive.

Landfill Collection Efficiency 75.00%

Landfill PTE from LandGEM 27.62 TPY

Fugitive VOC Emissions	= Landfill PTE from LandGEM x (1 - collection eff.)	6.91 TPY
VOC Emissions to Control Devices	= Landfill PTE from LandGEM - Fugitive VOC	20.71 TPY
Destruction Efficiency (NSPS Requirement)		98%
VOC Emissions after Control	= VOC to Control Device x (1 - Destruction Efficiency)	0.41 TPY

**Appendix A to the Technical Support Document (TSD)
Landfill CO and HAP Emissions**

Company Name: Clark-Floyd Landfill
Address: 14304 SR 60, Borden, Indiana 47106
Operational Permit Number: T019-33893-00097
Significant Source Modification No.: 019-36828-00097
Significant Permit Modification No.: 019-36988-00097
Reviewer: Adam Wheat

Temperature	536.67	°R
Atmospheric Pressure	1.00	atm
Maximum LandGEM LFG	2,028	SCFM
Maximum Captured LFG	1,521	SCFM

PTE of CO						
Pollutant	Molecular Weight	Concentration (ppmv)	Pollutant Flow (SCFM)	Landfill Emission (TPY)	Control Efficiency	Controlled Emissions (TPY)
CO at 1521 SCFM	28.01	141.00	0.2145	4.03	98%	0.08
PTE of Hazardous Air Pollutants - LandGEM - AP-42, Chapter 2.4, November 1998						
Pollutant	Concentration (ppmv)	Molecular Weight	Pollutant Flow (SCFM)	Landfill PTE (TPY)	Control Efficiency	Controlled PTE (TPY)
1,1,1-Trichloroethane	0.48	133.41	0.00070	0.06264	98%	1.25E-03
1,2,2,2-Tetrachloroethane	1.10	167.85	1.67E-03	1.88E-01	98%	3.77E-03
1,1-Dichloroethane	2.40	98.97	0.00370	0.24564	98%	4.91E-03
1,1-Dichloroethene	0.20	96.94	0.00030	0.01951	98%	3.90E-04
1,2-Dichloroethane	0.41	98.96	0.00060	0.03983	98%	7.97E-04
1,2-Dichloropropane	0.18	112.99	0.00027	0.02075	98%	4.15E-04
Acrylonitrile	6.30	53.06	0.00958	0.34106	98%	0.007
Benzene (1.9 or 11)	1.90	78.11	0.00290	0.15195	98%	3.04E-03
Carbon Disulfide	0.58	76.13	0.00090	0.04596	98%	9.19E-04
Carbon Tetrachloride	0.004	153.84	0.00000	0.00000	98%	0
Carbonyl Sulfide	0.49	60.07	0.00075	0.03003	98%	6.01E-04
Chlorobenzene	0.25	112.56	0.00040	0.03020	98%	6.04E-04
Chloroethane	1.30	64.52	0.00200	0.08656	98%	1.73E-03
Chloroform	0.03	119.39	0.00000	0.00000	98%	0.00E+00
Dichlorobenzene	0.21	147.00	0.00030	0.02958	98%	5.92E-04
Dichloromethane	14.00	84.94	0.02130	1.21363	98%	0.024
Ethylbenzene	4.60	106.16	0.00700	0.49849	98%	0.010
Ethylene Dibromide	0.001	187.88	0.00000	0.00000	98%	0
Hexane	6.60	86.18	0.01000	0.57810	98%	0.012
Mercury	2.90E-04	200.61	0.00000	0.00000	0%	0
Methyl Ethyl Ketone	7.10	72.11	0.01080	0.52237	98%	0.010
Methyl Isobutyl Ketone	1.90	100.16	0.00290	0.19484	98%	3.90E-03
Perchloroethylene	3.70	165.83	0.00560	0.62294	98%	0.012
Toluene (39 or 170)	39.00	92.13	0.05930	3.66481	98%	0.073
Trichloroethylene	2.80	131.40	0.00430	0.37902	98%	0.008
Vinyl Chloride	7.30	62.50	0.01110	0.46537	98%	0.009
Xylene	12.00	106.17	0.01830	1.30331	98%	0.026
			3.66		Highest	0.07
			10.73		Total	0.21

Methodology:

- 1) Average Flow (SCFM) = [Maximum Landfill Flow (SCFM)] x [ppmv pollutant / 1,000,000]
- 2) PTE (tons/yr) = $\frac{360 \times \text{Average Flow (SCFM)} \times \text{MW (lb/lb mole)} \times P \text{ (atm)}}{T \text{ (°R)}}$

**Appendix A to the Technical Support Document (TSD)
Potential to Emit - Flare**

Company Name: Clark-Floyd Landfill

Address: 14304 SR 60, Borden, Indiana 47106

Operational Permit Number: T019-33893-00097

Significant Source Modification No.: 019-36828-00097

Significant Permit Modification No.: 019-36988-00097

Reviewer: Adam Wheat

Input Data

Flare Heat Input Capacity	100.00	MMBtu/hr	Molecular Weight (S)	32.07	lb/lb mole
Heating Value of Landfill Gas	575.00	Btu/CF	Molecular Weight (SO ₂)	64.06	lb/lb mole
Calculated Landfill Gas	2,899	SCFM	Molecular Weight (HCL)	36.458	lb/lb mole
Inlet Gas Temperature	536.67	R	Weight % Water in LFG	7.0%	
Inlet Gas Pressure	1	atm	Molecular Weight (He)	86.18	lb/lb.mole
Maximum LGF Rate	3,000	SCFM			

Landfill Gas Flow Rate (Wet Basis)		Landfill Gas Flow Rate (Dry Basis)		% Methane	Methane Flow Rate (Dry Basis)		
3,000	SCFM	2,790	DSCFM	50.00%	1,395.00	SCFM	or 733.22 MMSCF/yr

Potential to Emit Calculations - Flare

Pollutant	Concentration (ppmv)	Pollutant Flow (SCFM)	Throughput	Emission Factor	PTE (TPY)	Notes
PM			1,395.00 SCFM	17.0 lb/MMCF CH ₄ , dry	6.23	AP-42, Chapter 2.4, Table 2.4-5, 11/1998
PM ₁₀			1,395.00 SCFM	17.0 lb/MMCF CH ₄ , dry	6.23	Assumed the same as PM
PM _{2.5}			1,395.00 SCFM	17.0 lb/MMCF CH ₄ , dry	6.23	Assumed the same as PM
S	46.9	0.141			3.03	AP-42, Chapter 2.4, page 2.4-8, 11/1998
SO ₂					6.06	PTE (SO ₂) = PTE (S) x MW (SO ₂) / MW (S)
VOC	232.05	0.696	103.50 MMBtu/hr	0.140 lb/MMBtu	0.80	AP-42, Chapter 13.5, Table 13.5-1, 09/91
CO			103.50 MMBtu/hr	0.370 lb/MMBtu	167.73	T019-18098-00097
NOx			103.50 MMBtu/hr	0.068 lb/MMBtu	30.83	T019-18098-00097
HCL	42	0.126			3.08	AP-42, Chapter 2.4, page 2.4-9, 11/1998

Methodology:

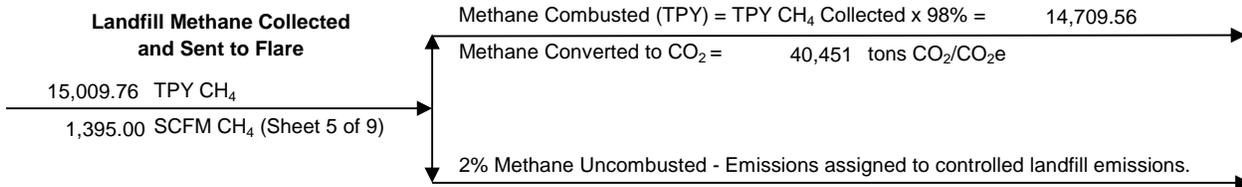
- Methane Flow Rate = Flare Gas Flow Rate x (% Methane)
- AP-42 does not include emission factors for PM₁₀ or PM_{2.5}. They are assumed identical to PM.
- DSCFM = SCFM (1 - % Water)
- Pollutant Flow (SCFM) = [Total Landfill Flow (SCFM)] x [ppmv pollutant / 1,000,000]
- PTE (TPY) = Flow (SCFM) x Emission Factor (lb/MMCF) x [MMCF/1,000,000 CF] x [60 min/hr] x [8,760 hr/yr] x [ton/2,000 lb]
- PTE (TPY) = Heat Input (MMBtu/hr) x Emission Factor (lb/MMBtu) x [8,760 hr/yr] x [ton/2,000 lb]
- PTE (tons/yr) = $\frac{360 \times \text{Pollutant (SCFM)} \times \text{MW (lb/lb mole)} \times P \text{ (atm)}}{T(^{\circ}\text{R})}$ (AP-42, Chapter 2.4, Eq. 4 - converted to US units)

Appendix A to the Technical Support Document (TSD)
Landfill Greenhouse Gas Emissions
 (Continued from Previous Sheet)

Flare Greenhouse Gas Emissions - Controlled Case

Methodology for Methane and Carbon Dioxide:

- 1) Combusted TPY CO₂/CO₂e = Combusted Methane (TPY CH₄) x Molecular Weight Ratio CO₂/CH₄ (44/16)
- 2) Uncombusted Methane as TPY CO₂e 2009 = Uncombusted Methane (TPY CH₄) x 2009 global warming potential (21)
- 2) Uncombusted Methane as TPY CO₂e 2013 = Uncombusted Methane (TPY CH₄) x 2013 global warming potential (25)
- 4) Methane Combusted (TPY CH₄) = Landfill Methane Collected and Sent to Flare (TPY) x Combustion Efficiency
- 5) Methane to Flare (TPY) = 360 x Methane Flow (SCFM) x 16 lb-lb.mole x 1 atm / 536.67 R



Methodology for N₂O:

- 1) Methane (MMCF/yr) = Methane Flow (SCFM) x 60 min/hr x 8,760 hr/yr x 1 MMCF / 1,000,000 CF
- 2) Emission Factor (lb/MMBtu) = 2.2046 lb/kg x Emission Factor (kg/MMBtu)
- 3) Methane (MMBtu/yr) = Landfill Gas Heating Value (MMBtu/MMCF) x Methane Usage (MMCF/yr)
- 4) N₂O (TPY) = Emissions Factor (lb/MMBtu) x Methane Usage (MMBtu/yr) x 1 ton / 2,000 lb
- 5) 2009 N₂O (TPY as CO₂e) = N₂O (TPY) x 2009 global warming potential (310)
- 6) 2013 N₂O (TPY as CO₂e) = N₂O (TPY) x 2013 global warming potential (298)

Methane to Flare (SCFM)	1,395.0 SCFM CH ₄
Methane Usage (MMCF/yr)	733.21
N ₂ O Emission Factor (kg/MMBtu)	6.30E-04
N ₂ O Emission Factor (lb/MMBtu)	1.389E-03
Methane Heating Value	1,000 MMBtu/MMCF
Methane Combusted (MMBtu/yr)	733,212
N ₂ O (TPY)	0.509
N ₂ O (TPY as CO ₂ e - 2009 GWP of 310)	157.790
N ₂ O (TPY as CO ₂ e - 2013 GWP of 298)	151.682

Controlled Flare Emissions

Source of Emissions	Biogenic CO ₂ (TPY as CO ₂ e)	Non-Biogenic GHG 2009 GWPs (TPY as CO ₂ e)	Non-Biogenic GHG 2013 GWPs (TPY as CO ₂ e)
Methane to Flare / Combusted and Converted to CO ₂	40,451	0	0
N ₂ O from Landfill Gas Combusted in Flare	0	158	152
Totals	40,451 TPY CO ₂ e	158 TPY CO ₂ e	152 TPY CO ₂ e

**Appendix A to the Technical Support Document (TSD)
PTE - Two (2) LFG Fired Engine Sets - 4-Stroke Lean Burn (EU-1/2)**

Company Name: Clark-Floyd Landfill

Address: 14304 SR 60, Borden, Indiana 47106

Operational Permit Number: T019-33893-00097

Significant Source Modification No.: 019-36828-00097

Significant Permit Modification No.: 019-36988-00097

Reviewer: Adam Wheat

Input Data - Each Engine

Engine bHp - Output	1,468 bHp (Output)	Molecular Weight (S)	32.07 lb/lb mole
Break Specific Fuel Consumption	6,683 Btu Input/Hp.Hr Output	Molecular Weight (SO ₂)	64.060 lb/lb mole
Heat Input Required	9.81 MMBtu Input/hr	Molecular Weight (HCL)	36.458 lb/lb mole
Heating Value of Landfill Gas	575 Btu/CF	Molecular Weight (CL)	35.4532 lb/lb mole
Design LFG Flow	338 SCFM	Weight % Water in LFG	7.0%
Inlet Gas Pressure	1 atm	Inlet Gas Temperature	536.67 R

Landfill Gas Flow Rate (Wet Basis)	Landfill Gas Flow Rate (Dry Basis)	% Methane	Methane Flow Rate (Dry Basis)
338 SCFM	315 DSCFM	50.00%	158 SCFM or 84 MMSCF/yr

Potential to Emit Calculations - Methane Combustion - Each Engine

Pollutant	Concentration (ppmv)	Pollutant Flow (SCFM)	Throughput	Emission Factor	PTE (TPY)	Notes
PM			158.0 SCFM	48.00 lb/MMCF, CH ₄ dry	1.99	AP-42, Chapter 2.4, Table 2.4-5, 11/1998
PM ₁₀			158.0 SCFM	48.00 lb/MMCF, CH ₄ dry	1.99	Assumed the same as PM
PM _{2.5}			158.0 SCFM	48.00 lb/MMCF, CH ₄ dry	1.99	Assumed the same as PM
S	46.9	0.016			0.34	AP-42, Chapter 2.4, page 2.4-8, 11/1998
SO ₂					0.68	PTE (SO ₂) = PTE (H ₂ S) x MW (SO ₂) / MW (H ₂ S)
VOC			9.81 MMBtu/hr	0.118 lb/MMBtu input	5.07	AP-42, Chapter 3.2, Table 3.2-2, 7/2000
CO			158.0 SCFM	470 lb/MMCF, CH ₄ dry	19.52	AP-42, Chapter 2.4, Table 2.4-5, 11/1998
NO _x			158.0 SCFM	250 lb/MMCF, CH ₄ dry	10.38	AP-42, Chapter 2.4, Table 2.4-5, 11/1998
HCL	42.0	0.014			0.34	AP-42, Chapter 2.4, page 2.4-9, 11/1998
CO ₂			9.81 MMBtu/hr	114.79 lb/MMBtu input	4,932	40 CFR 98, Subpart C, Table C-1 (Landfill Gas - 52.07 Kg/MMBtu)
CH ₄			9.81 MMBtu/hr	7.05E-03 lb/MMBtu input	0.303	40 CFR 98, Subpart C, Table C-2 (Biomass Gas 3.2e-3 kg/MMBtu)
N ₂ O			9.81 MMBtu/hr	1.39E-03 lb/MMBtu input	0.060	40 CFR 98, Subpart C, Table C-2 (Biomass Gas 6.3e-4 kg/MMBtu)
Biogenic GHGs as CO ₂ e using 2009 GWPs // CO ₂ = 1					4,932	All CO ₂ is biogenic
Non-Biogenic GHGs as CO ₂ e using 2009 GWPs // CH ₄ = 21, N ₂ O = 310					25	CH ₄ and N ₂ O Emissions
Biogenic GHGs as CO ₂ e using 2013 GWPs // CO ₂ = 1					4,932	All CO ₂ is biogenic
Non-Biogenic GHGs as CO ₂ e using 2013 GWPs // CH ₄ = 25, N ₂ O = 298					25	CH ₄ and N ₂ O Emissions

Methodology:

- Methane Flow Rate = Flare Gas Flow Rate x (% Methane)
- AP-42 does not include emission factors for PM₁₀ or PM_{2.5}. They are assumed identical to PM.
- DSCFM = SCFM (1 - % Water)
- Pollutant Flow (SCFM) = [Total Landfill Flow (SCFM)] x [ppmv pollutant / 1,000,000]
- PTE (TPY) = Flow (SCFM) x Emission Factor (lb/MMCF) x [MMCF/1,000,000 CF] x [60 min/hr] x [8,760 hr/yr] x [ton/2,000 lb]
- PTE (TPY) = Heat Input (MMBtu/hr) x Emission Factor (lb/MMBtu) x [8,760 hr/yr] x [ton/2,000 lb]
- CO₂e = [TPY CO₂] + 21 x [TPY CH₄] + 310 x [TPY N₂O]
- PTE (tons/yr) = $\frac{360}{T(^{\circ}R)} \times \text{Pollutant (SCFM)} \times \text{MW (lb/lb mole)} \times P \text{ (atm)}$ (AP-42, Chapter 2.4, Eq. 4 - converted to US units)

T(^{\circ}R)

**Appendix A to the Technical Support Document (TSD)
PTE - One (1) LFG Fired Engine Sets - 4-Stroke Lean Burn (EU-3)**

Company Name: Clark-Floyd Landfill
Address: 14304 SR 60, Borden, Indiana 47106
Operational Permit Number: T019-33893-00097
Significant Source Modification No.: 019-36828-00097
Significant Permit Modification No.: 019-36988-00097
Reviewer: Adam Wheat

Input Data - Each Engine

Engine bHp - Output	1,966 bHp (Output)	Molecular Weight (S)	32.07 lb/lb mole
Break Specific Fuel Consumption	9,664 Btu Input/Hp.Hr Output	Molecular Weight (SO ₂)	64.060 lb/lb mole
Heat Input Required	19.00 MMBtu Input/hr	Molecular Weight (HCL)	36.458 lb/lb mole
Heating Value of Landfill Gas	575 Btu/CF	Molecular Weight (CL ⁻)	35.4532 lb/lb mole
Design LFG Flow	551 SCFM	Weight % Water in LFG	7.0%
Inlet Gas Pressure	1 atm	Inlet Gas Temperature	536.67 R

Landfill Gas Flow Rate (Wet Basis)		Landfill Gas Flow Rate (Dry Basis)		% Methane	Methane Flow Rate (Dry Basis)	
551	SCFM	513	DSCFM	50.00%	257 SCFM	or 136 MMSCF/yr

Potential to Emit Calculations - Methane Combustion - Each Engine

Pollutant	Concentration (ppmv)	Pollutant Flow (SCFM)	Throughput	Emission Factor	PTE (TPY)	Notes
PM				0.49 lb/hr	2.15	Vendor Guarantee
PM ₁₀				0.49 lb/hr	2.15	Vendor Guarantee
PM _{2.5}				0.49 lb/hr	2.15	Vendor Guarantee
S	46.9	0.026			0.56	AP-42, Chapter 2.4, page 2.4-8, 11/1998
SO ₂					1.12	PTE (SO ₂) = PTE (H ₂ S) x MW (SO ₂) / MW (H ₂ S)
VOC				1.06 lb/hr	4.64	Vendor Guarantee
CO				9.71 lb/hr	42.53	Vendor Guarantee
NO _x				3.56 lb/hr	15.59	Vendor Guarantee
HCL	42.0	0.023			0.56	AP-42, Chapter 2.4, page 2.4-9, 11/1998
CO ₂			19.00 MMBtu/hr	114.79 lb/MMBtu input	9,553	40 CFR 98, Subpart C, Table C-1 (Landfill Gas - 52.07 Kg/MMBtu)
CH ₄			19.00 MMBtu/hr	7.05E-03 lb/MMBtu input	0.587	40 CFR 98, Subpart C, Table C-2 (Biomass Gas 3.2e-3 kg/MMBtu)
N ₂ O			19.00 MMBtu/hr	1.39E-03 lb/MMBtu input	0.116	40 CFR 98, Subpart C, Table C-2 (Biomass Gas 6.3e-4 kg/MMBtu)
Biogenic GHGs as CO ₂ e using 2009 GWPs // CO ₂ = 1					9,553	All CO ₂ is biogenic
Non-Biogenic GHGs as CO ₂ e using 2009 GWPs // CH ₄ = 21, N ₂ O = 310					48	CH ₄ and N ₂ O Emissions
Biogenic GHGs as CO ₂ e using 2013 GWPs // CO ₂ = 1					9,553	All CO ₂ is biogenic
Non-Biogenic GHGs as CO ₂ e using 2013 GWPs // CH ₄ = 25, N ₂ O = 298					49	CH ₄ and N ₂ O Emissions

Methodology:

- Methane Flow Rate = Flare Gas Flow Rate x (% Methane)
- AP-42 does not include emission factors for PM₁₀ or PM_{2.5}. They are assumed identical to PM.
- DSCFM = SCFM (1 - % Water)
- Pollutant Flow (SCFM) = [Total Landfill Flow (SCFM)] x [ppmv pollutant / 1,000,000]
- PTE (TPY) = Flow (SCFM) x Emission Factor (lb/MMCF) x [MMCF/1,000,000 CF] x [60 min/hr] x [8,760 hr/yr] x [ton/2,000 lb]
- PTE (TPY) = Heat Input (MMBtu/hr) x Emission Factor (lb/MMBtu) x [8,760 hr/yr] x [ton/2,000 lb]
- CO₂e = [TPY CO₂] + 21 x [TPY CH₄] + 310 x [TPY N₂O]
- PTE (tons/yr) = $\frac{360 \times \text{Pollutant (CFM)} \times \text{MW (lb/lb mole)} \times \text{P (atm)}}{\text{T (°R)}}$ (AP-42, Chapter 2.4, Eq. 4 - converted to US units)

**Appendix A to the Technical Support Document (TSD)
Fugitive Emissions from Paved Roads**

Company Name: Clark-Floyd Landfill
Address: 14304 SR 60, Borden, Indiana 47106
Operational Permit Number: T019-33893-00097
Significant Source Modification No.: 019-36828-00097
Significant Permit Modification No.: 019-36988-00097
Reviewer: Adam Wheat

Average Vehicle Weight

Vehicle Type	Vehicles per Day	Average Weight (tons)	Trips per Year	Miles per Trip	Vehicle Miles Traveled (miles/year)	Traffic Component	Component Weight (tons)
6 Wheel Vehicles	160	34.5	58,400	1	58,400	66.67%	23.00
4 Wheel Vehicles	80	5.5	29,200	1	29,200	33.33%	1.83
Total VMT					87,600		
Average Vehicle Weight (tons) - W							24.83

Site Specific Constants

Value Name	Symbol	Value	Units	Source
Emission Factor	E	---	lb/VMT	Calculated
Particle Size Multiplier	k for PM	0.011	lb/VMT	AP-42 Table 13.2.1-1, January 2011
Particle Size Multiplier	k for PM ₁₀	0.0022	lb/VMT	AP-42 Table 13.2.1-1, January 2011
Particle Size Multiplier	k for PM _{2.5}	0.00054	lb/VMT	AP-42 Table 13.2.1-1, January 2011
Silt Loading	sL (Winter)	0.6	g/m ³	AP-42, Chapter 13.2.1, January 2011, ADT 500 to 5,000
Silt Loading	sL (Non-Winter)	0.2	g/m ³	AP-42, Chapter 13.2.1, January 2011, ADT 500 to 5,000
Winter Days	Winter Days	90	days	Estimated by IDEM
Non-Winter Days	Non-Winter Days	275	days	Estimated by IDEM
Days >0.01" of rain	P	120	days	AP-42, Figure 13.2.1-2, January 2011
Total Days in Period	N	365	days	Days in the period
Mean Vehicle Weight	W	24.83	tons	Provided by Permittee

(Continued on Next Page)

Appendix A to the Technical Support Document (TSD)
Fugitive Emissions from Paved Roads
(Continued from Previous Page)

Winter Emission Factor Calculations

$$E = [k * (sL \text{ for Winter})^{0.91} * (W)^{1.02}] * [1 - P/(4 * N)] \quad \text{AP-42, Chapter 13.2.1-5, January 2011, Eq. 2}$$

E for PM (lb/VMT) =	0.1680 lb/VMT
E for PM ₁₀ (lb/VMT) =	0.0336 lb/VMT
E for PM _{2.5} (lb/VMT) =	0.0082 lb/VMT

Non-Winter Emission Factor Calculations

$$E = [k * (sL \text{ for Non-Winter})^{0.91} * (W)^{1.02}] * [1 - P/(4 * N)] \quad \text{AP-42, Chapter 13.2.1-5, January 2011, Eq. 2}$$

E for PM (lb/VMT) =	0.0618 lb/VMT
E for PM ₁₀ (lb/VMT) =	0.0124 lb/VMT
E for PM _{2.5} (lb/VMT) =	0.0030 lb/VMT

Average Annual Emission Factor

$$\text{Annual Average Emission Factor} = [\text{Winter Days} * \text{Winter Factor} + \text{Non-Winter Days} * \text{Winter Factor}] / 365$$

E for PM (lb/VMT) =	0.0880 lb/VMT
E for PM ₁₀ (lb/VMT) =	0.0176 lb/VMT
E for PM _{2.5} (lb/VMT) =	0.0043 lb/VMT

Uncontrolled Potential to Emit

PM Emissions (TPY) = [Average E for PM (lb/VMT) * Total VMT/yr * 1 ton / 2,000 lb]	3.85 TPY
PM ₁₀ Emissions (TPY) = [Average E for PM ₁₀ (lb/VMT) * Total VMT/yr * 1 ton / 2,000 lb]	0.77 TPY
PM _{2.5} Emissions (TPY) = [Average E for PM _{2.5} (lb/VMT) * Total VMT/yr * 1 ton / 2,000 lb]	0.19 TPY

Controlled Potential to Emit

Control Efficiency 80.00% (Based on control measures specified in the Fugitive Dust Control Plan)

Limited PM Emissions (TPY) = Potential to Emit PM * (1 - Control Efficiency)	0.77 TPY
Limited PM ₁₀ Emissions (TPY) = Potential to Emit PM ₁₀ * (1 - Control Efficiency)	0.15 TPY
Limited PM _{2.5} Emissions (TPY) = Potential to Emit PM _{2.5} * (1 - Control Efficiency)	0.04 TPY

Notes:

(a) Vehicle travel data provided by Permittee.

Methodology:

- (a) Vehicle Miles Traveled (miles/yr) = Trips per year x Miles per trip
- (b) Component Weight (tons) = Traffic Component (%) x Vehicle Weight (ton)
- (c) Average Vehicle Weight (ton) = Sum of component weights
- (d) Potential to Emit (TPY) = Emission Factor (lb/mile) x Vehicle Miles Traveled (miles/yr) x 1 ton/2,000 lb

Appendix A to the Technical Support Document (TSD) Fugitive Emissions from Unpaved Roads

Company Name: Clark-Floyd Landfill

Address: 14304 SR 60, Borden, Indiana 47106

Operational Permit Number: T019-33893-00097

Significant Source Modification No.: 019-36828-00097

Significant Permit Modification No.: 019-36988-00097

Reviewer: Adam Wheat

Average Vehicle Weight

Vehicle Type	Vehicles per Day	Average Weight (tons)	Trips per Year	Miles per Trip	Vehicle Miles Traveled (miles/year)	Traffic Component	Component Weight (tons)
6 Wheel Vehicles	160	34.5	58,400	1	58,400	66.67%	23.00
4 Wheel Vehicles	80	5.5	29,200	1	29,200	33.33%	1.83
Total VMT					87,600		
Average Vehicle Weight (tons) - W							24.83

Site Specific Constants

Value Name	Symbol	Value	Units	Source
Emission Factor	E	---	lb/VMT	Calculated
Particle Size Multiplier	k for PM	4.90	lb/VMT	AP-42, Table 13.2.2-2, November 2006
Particle Size Multiplier	k for PM10	1.50	lb/VMT	AP-42, Table 13.2.2-2, November 2006
Particle Size Multiplier	k for PM2.5	0.15	lb/VMT	AP-42, Table 13.2.2-2, November 2006
Silt Content	s	6.40	%	AP-42, Chapter 13.2, mean value for landfills
Days >0.01" of rain	P	120.00	days	AP-42, Figure 13.2.2-1, November 2006
Emperical Constant	a for PM	0.70	Unitless	AP-42, Table 13.2.2-2, November 2006
Emperical Constant	a for PM10	0.90	Unitless	AP-42, Table 13.2.2-2, November 2006
Emperical Constant	a for PM2.5	0.90	Unitless	AP-42, Table 13.2.2-2, November 2006
Emperical Constant	b for PM	0.45	Unitless	AP-42, Table 13.2.2-2, November 2006
Emperical Constant	b for PM10	0.45	Unitless	AP-42, Table 13.2.2-2, November 2006
Emperical Constant	b for PM2.5	0.45	Unitless	AP-42, Table 13.2.2-2, November 2006
Mean Vehicle Weight	W	24.83	tons	Provided by Permittee

Emission Factor Calculations

$$E = [k * (s/12)^a * (W/3)^b] * [(365 - P) / 365] \quad \text{AP-42, Chapter 13.2.1-5, January 2011, Eq. 2}$$

$$\begin{aligned} E \text{ for PM (lb/VMT)} &= 5.48 \text{ lb/VMT} \\ E \text{ for PM10 (lb/VMT)} &= 1.48 \text{ lb/VMT} \\ E \text{ for PM2.5 (lb/VMT)} &= 0.15 \text{ lb/VMT} \end{aligned}$$

Uncontrolled Potential to Emit

$$\begin{aligned} \text{PM Emissions (TPY)} &= [E \text{ for PM (lb/VMT)} * \text{Total VMT/yr} * 1 \text{ ton} / 2,000 \text{ lb}] && 240.02 \text{ TPY} \\ \text{PM10 Emissions (TPY)} &= [E \text{ for PM10 (lb/VMT)} * \text{Total VMT/yr} * 1 \text{ ton} / 2,000 \text{ lb}] && 64.82 \text{ TPY} \\ \text{PM2.5 Emissions (TPY)} &= [E \text{ for PM2.5 (lb/VMT)} * \text{Total VMT/yr} * 1 \text{ ton} / 2,000 \text{ lb}] && 6.57 \text{ TPY} \end{aligned}$$

Controlled Potential to Emit

$$\text{Control Efficiency} \quad 80.00\% \text{ (Based on AP-42, Ch. 13.2.2, Figure 13.2.2-5, November 2006)}$$

$$\begin{aligned} \text{Limited PM Emissions (TPY)} &= \text{Potential to Emit PM} * (1 - \text{Control Efficiency}) && 48.00 \text{ TPY} \\ \text{Limited PM10 Emissions (TPY)} &= \text{Potential to Emit PM10} * (1 - \text{Control Efficiency}) && 12.96 \text{ TPY} \\ \text{Limited PM2.5 Emissions (TPY)} &= \text{Potential to Emit PM2.5} * (1 - \text{Control Efficiency}) && 1.31 \text{ TPY} \end{aligned}$$

Notes:

(a) Vehicle travel data provided by Permittee.

Methodology:

- (a) Vehicle Miles Traveled (miles/yr) = Trips per year x Miles per trip
 (b) Component Weight (tons) = Traffic Component (%) x Vehicle Weight (ton)
 (c) Average Vehicle Weight (ton) = Sum of component weights



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

May 11, 2016
Clark-Floyd Landfill
019-36828-00097 & 019-36988-00097

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 2/17/2016



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AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

May 11, 2016

A 30-day public comment period has been initiated for:

Permit Number: 019-36828-00097 & 019-36988-00097
Applicant Name: Clark-Floyd Landfill
Location: Borden, Clark County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 2/17/2016



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Michael R. Pence
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Carol S. Comer
Commissioner

May 11, 2016

Mr. Robert Lee
Clark-Floyd Landfill
6108 Sable Mill Court
Jeffersonville, IN 47130

Re: Public Notice
Clark-Floyd Landfill
Permit Level: Significant Source Modification &
Significant Permit Modification
Permit Number: 019-36828-00097 &
019-36988-00097

Dear Mr. Lee:

Enclosed is a copy of your draft Significant Source & Permit Modifications, 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 Evening News in Jeffersonville, Indiana publish the abbreviated version of the public notice no later than May 14, 2016. 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 Clark County Public Library – Borden Branch, 117 West Main Street in Borden, Indiana. 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 Adam Wheat, 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 3-8397 or dial (317) 233-8397.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

May 11, 2016

To: Clark County Public Library – Borden Branch

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: Clark-Floyd Landfill
Permit Number: 019-36828-00097 & 019-36988-00097

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 2/16/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 11, 2016

Evening News
221 Spring Street
Jeffersonville, IN 47130

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Clark-Floyd Landfill, Clark 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 May 14, 2016.

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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Significant Source Modification & Significant Permit Modification
Permit Number: 019-36828-00097 & 019-36988-00097

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 5/11/2016 Clark-Floyd Landfill 019-36828/36988-00097 Draft		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Robert Lee Clark-Floyd Landfill 6108 Sable Mill Ct Jeffersonville IN 47130 (Source CAATS)										
2		Clark County Public Library - Borden Branch 117 Main St Borden IN 47106 (Library)										
3		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
4		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)										
5		Clarksville Town Council 2000 Broadway Clarksville IN 47129 (Local Official)										
6		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
7		Borden Town Council and Town Manager P.O. Box 125 Borden IN 47106 (Local Official)										
8		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
9		lyta Bernstein 1812 Valley Vista Dr Borden IN 47106 (Affected Party)										
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
9			