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Governor

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Commissioner

December 29, 2003

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P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Belmont Advanced Wastewater Treatment Plant / T097-5989-00032

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

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

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

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

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**City of Indianapolis,  
Belmont Advanced Wastewater Treatment Plant  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: T097-5989-00032	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 29, 2003  Expiration Date: December 29, 2008

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary municipal waste water treatment plant with sewage sludge incinerators.

Responsible Official:	Deputy Director of Operations - Department of Public Works, City of Indianapolis
Source Address:	2700 Belmont Avenue, Indianapolis, IN 46221
Mailing Address:	2700 Belmont Avenue, Indianapolis, IN 46221
General Source Phone Number:	317-639-7000 (offices of contract operator for City of Indianapolis - White River Environmental Partnership)
SIC Code:	4952
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I1, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I1 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I1, exhausts to stacks No. 01 or No. 02.
- (b) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I2, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I2 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I2, exhausts to stacks No. 01 or No. 03.
- (c) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I3, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I3 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I3, exhausts to stacks No. 01 or No. 04.
- (d) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I4, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I4 with a capacity of 22.5

million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Venturi-Pak scrubber. Incinerator, I4, exhausts to stacks No. 01 or No. 05.

- (e) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I5, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I5 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I5 and I6. Incinerator, I5, exhausts to stack No. 06 which is a common stack with I6.
- (f) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I6, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I6 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I6 and I5. Incinerator, I6, exhausts to stack No. 06 which is a common stack with I5.
- (g) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I7, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I7 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I7 and I8. Incinerator, I7, exhausts to stack No. 7 which is a common stack with I8.
- (h) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I8, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I8 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I7 and I8. Incinerator, I8, exhausts to stack No. 07 which is a common stack with I7.
- (i) A Stone Johnston Corp. natural gas/No.2 fuel oil-fired boiler with serial number 843401, constructed in 1987, identified as B1, with a maximum heat input capacity of 12.6 million BTU/hr and exhausting to stack No. 08.
- (j) A Stone Johnston Corp. natural gas/No.2 fuel oil-fired boiler with serial number 843402, constructed in 1987, identified as B2, with a maximum heat input capacity of 12.6 million BTU/hr and exhausting to stack No. 09.
- (k) A Stone Johnston Corp. natural gas/No.2 fuel oil-fired boiler with serial number 843403, constructed in 1987, identified as B3, with a maximum heat input capacity of 12.6 million BTU/hr and exhausting to stack No. 10.
- (l) Wastewater treatment operations which includes plant influent systems, headworks trash rake building, headworks raw sewage pump building, headworks bar screen building, headworks grit chambers, southport gate structure, primary treatment systems, grease and scum building, primary effluent diversion structure, pig retrieval structure, bio-roughing, nitrification system, effluent filter building and disinfection system, dissolved air flotation, gravity thickening, and dewatering operations.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2 and 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

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

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

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

## SECTION B GENERAL CONDITIONS

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

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

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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This permit 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.

### B.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services (Indianapolis OES)  
Administration Building  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, and the Indianapolis OES 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and the Indianapolis OES copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (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 contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.12 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.13 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 in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.14** Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ shall include the information specified in 326 IAC 2-7-4. Such

information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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.

(2) If IDEM, OAQ upon receiving a timely and complete 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.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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 in writing by IDEM, OAQ any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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- (a) No Part 70 permit revision 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.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-

20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and the Indianapolis OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ and 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) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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- (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, I/M & Billing Section), to determine the appropriate permit fee.



## 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 5-1-3 (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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

#### 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 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

##### C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus five percent ( $\pm 5\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

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C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and 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]

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C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, and the Indianapolis OES, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this

permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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 documents submitted pursuant to this condition do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

C.17 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]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
Administration Building  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1**

**FACILITY OPERATION CONDITIONS -  
Sewage Sludge Incinerators, I1 - I8**

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

- (a) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I1, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I1 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I1, exhausts to stacks No. 01 or No. 02.
- (b) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I2, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I2 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I2, exhausts to stacks No. 01 or No. 03.
- (c) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I3, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I3 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I3, exhausts to stacks No. 01 or No. 04.
- (d) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I4, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I4 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Venturi-Pak scrubber. Incinerator, I4, exhausts to stacks No. 01 or No. 05.
- (e) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I5, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I5 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I5 and I6. Incinerator, I5, exhausts to stack No. 06 which is a common stack with I6.
- (f) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I6, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No. 2 fuel oil-fired auxiliary fuel burners also included as I6 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I6 and I5. Incinerator, I6, exhausts to stack No. 06 which is a common stack with I5.
- (g) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I7, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I7 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I7 and I8. Incinerator, I7, exhausts to stack No. 7 which is a common stack with I8.
- (h) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I8, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I8 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I7 and I8. Incinerator, I8, exhausts to stack No. 07 which is a common stack with I7.

(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)]**

### **D.1.1 Particulate Matter [326 IAC 6-1-12] [326 IAC 2-3]**

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- (a) Pursuant to 326 IAC 6-1-12 (Marion county particulate matter emission limitations), the total particulate matter emissions from incinerators I1, I2, I3, and I4 shall not exceed 72.5 tons per year and the emission rate shall not exceed 0.030 grains/dscf. The particulate matter emissions from each individual incinerator for I5, I6, I7, and I8 shall not exceed 17.9 tons per year and the emission rate shall not exceed 0.030 grains/dscf.
- (b) Pursuant to Emission Offset Limits, 326 IAC 2-3, established by the Indianapolis OES in the City of Indianapolis operating permit which was issued on August 21, 1990, the total particulate matter emissions from all incinerators I1-I8 shall not exceed 40.3 tons per year and the total amount of sewage sludge incinerated by all incinerators, I1-I8, shall not exceed 62,050 dry tons of sludge per any 12-month period.

### **D.1.2 PSD Minor Limit [326 IAC 2-2]**

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Pursuant to Significant Source Modification 097-16971-00032, issued on October 15, 2003, the I2 incinerator after completion of rehabilitation shall comply with the following:

- (a) The amount of dry sludge delivered to the No. 2 incinerator shall be limited to less than 17,712 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Emissions of CO from the No. 2 incinerator shall not exceed 51.78 pounds per ton of dry sludge burned.

Compliance with these limits make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, by limiting the CO emissions from the No. 2 incinerator to less than 458.58 tons per year. The source may petition to have the limits in (a) and (b) above modified based on the results of the stack testing required under Condition D.1.2, provided that the resulting allowable CO emissions are less than 458.58 tons per year, and the emissions of any other criteria pollutant are not increased above the PSD significant threshold listed in 326 IAC 2-2-1(jj)(1).

### **D.1.3 Sulfur Dioxide [326 IAC 7-4-2]**

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Pursuant to 326 IAC 7-4-2 (Marion county sulfur dioxide emission limitations), the sulfur dioxide emissions from each of the incinerators I1- I8 must not exceed 2.0 lb of SO<sub>2</sub> per dry ton of sludge burned and 14.19 pounds per hour.

### **D.1.4 General Provisions Relating to HAPs [326 IAC 14-1-1] [40 CFR Part 61, Subpart A]**

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The provisions of 40 CFR Part 61, Subpart A-General Provisions, which are incorporated by reference as 326 IAC 14-1-1, apply to the facilities (incinerators I1 - I8) described in this section except when otherwise specified in 40 CFR Part 61, Subpart C or 40 CFR Part 61, Subpart E.

### **D.1.5 Beryllium [40 CFR Part 61, Subpart C]**

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Pursuant to 40 CFR Part 61, Subpart C, the total emissions of beryllium from all incinerators I1-I8 shall not exceed a total of 10 grams per 24-hour period.

### **D.1.6 Mercury [40 CFR Part 61, Subpart E]**

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Pursuant to 40 CFR Part 61, Subpart E, the total emissions of mercury from all incinerators I1-I8 shall not exceed a total of 3200 grams per 24-hour period.

### **D.1.7 Regulation Non-applicability [326 IAC 12][40 CFR 60]**

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- (a) Incinerators I1, I2, I3, and I4 are not subject to the requirements of 40 CFR 60, Subpart O (Standards of Performance for Sewage Treatment Plants) because the incinerators were constructed prior to June 11, 1973, the applicability date of this rule.
- (b) Incinerators I1, I2, I3, and I4 are not subject to the requirements of 40 CFR 60, Subpart E (Standards of Performance for Incinerators) because the incinerators were constructed prior to August 17, 1971, the applicability date of this rule.

**D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.9 Testing Requirements [326 IAC 2-7-6(1)(6)] [326 IAC 2-1.1-11]**

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- (a) Testing Requirements for I1, I2, I3, and I4: During the period between 6 and 12 months after issuance of this Part 70 permit, the Permittee shall perform the following tests in accordance with 326 IAC 3-6:
  - (1) PM testing; Each incinerator shall be tested using methods approved by the Commissioner.
  - (2) SO<sub>2</sub> testing; Each incinerator shall be tested using methods approved by the Commissioner.
  - (3) Beryllium testing; Each incinerator shall be tested using methods approved by the Commissioner.
  - (4) Mercury testing; Each incinerator shall be tested using methods approved by the Commissioner.

During the first permit term, these tests shall be repeated once every year from the date of this valid compliance demonstration. After the first permit term, these tests shall be repeated once every 2.5 years from the date of this valid compliance demonstration.

- (b) Testing Requirements for I5/I6 and I7/I8: If the operations at I5/I6 or I7/I8 are restarted, the Permittee shall perform the following tests in accordance with 326 IAC 3-6 within 60 days of commencement of operation, but no later than 180 days after start-up:
  - (1) PM testing; Using methods approved by the Commissioner.
  - (2) SO<sub>2</sub> testing; Using methods approved by the Commissioner.
  - (3) Beryllium testing; Using methods approved by the Commissioner.
  - (4) Mercury testing; Using methods approved by the Commissioner.

If the operations at I5/I6 or I7/I8 are restarted, these tests shall be repeated once every year from the date of last valid compliance test during the permit term. For any year that the units I5/I6 or I7/I8 are not in operation for the entire year, the Permittee can delay the repeat testing until the subsequent anniversary of last valid compliance test.

- (c) Compliance shall be determined by a performance test in accordance with Section C - Performance Testing.

- (d) When testing to determine compliance with Condition D.1.1, the following apply:
- (1) Based on the throughput limit in Condition D.1.1(b), the 72.5 tons per year particulate matter emission limitation in Condition D.1.1(a) for incinerators I1, I2, I3, and I4 combined is equivalent to a particulate matter emission limit of 2.3 pounds per ton of sludge processed.
  - (2) The 17.9 tons per year particulate matter emission limitation in Condition D.1.1(a) for incinerators I5, I6, I7, and I8 individually is equivalent to a particulate matter emission limit of 35.8 tons per year for each pair of incinerators (i.e. I5/I6 and I7/I8). Based on the throughput limit in Condition D.1.1(b), this limitation is equivalent to a particulate matter emission limitation of 1.2 pounds per ton of sludge processed.
  - (3) The particulate matter emission limitation in Condition D.1.1(b) is equivalent to an emission limitation of 1.3 pounds of particulate matter per ton of sludge processed.
- (e) When testing to determine compliance with Condition D.1.3 for I5/I6 and I7/I8, the following apply:
- (1) The sulfur dioxide emission limitation of 2.0 pounds per dry ton of sludge burned for each individual incinerator, I1-I8, is equivalent to a limit of 4 pounds of sulfur dioxide per dry ton of sludge processed for the pairs of incinerators (I5/I6 and I7/I8).
  - (2) The sulfur dioxide emission limitation of 14.19 pounds per hour for each individual incinerator, I1-I8, is equivalent to a limit of 28.38 pounds of sulfur dioxide per hour for the pairs of incinerators (I5/I6 and I7/I8).

**D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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Pursuant to Significant Source Modification 097-16971-00032, issued on October 15, 2003, within 60 days after achieving maximum production rate, but no later than 180 days after post-rehabilitation start-up, in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform CO testing for the No. 2 incinerator utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

**D.1.11 Particulate Matter (PM)**

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Pursuant to the City of Indianapolis operating permit issued on August 21, 1990, and in order to comply with D.1.1, the venturi and tray type scrubbers for all incinerators I1-I8 shall be in operation at all times when the incinerators (I1-I8) are in operation.

**Compliance Monitoring Requirements**

**D.1.12 Parametric Monitoring**

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- (a) The Permittee shall record the total static pressure drop across the scrubber used in conjunction with each of the incinerators, I1-I8, at least once per shift when the incinerator(s) are in operation. When for any one reading, the pressure drop across each scrubber is less than the normal minimum of 20 inches of water for incinerators I1, I2, and I3, or 18 inches of water for incinerators I4, I5, I6, I7, and I8, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation,

Records, and Reports. A pressure reading that is below the mentioned minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) The Permittee shall record the water flow rate through each scrubber used in conjunction with each of the incinerators, I1-I8, at least once per shift when the incinerator(s) are in operation. When for any one reading, the water flow rate through each scrubber is less than the normal minimum of 700 gallons per minute for incinerators I1, I2, I3, or 600 gallons per minute for incinerator I4, or 400 gallons per minute for incinerators I5, I6, I7, and I8 or minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A water flow rate reading that is below the mentioned minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) The instruments used for determining the pressure and flow rates through the scrubber shall comply with Section C - Pressure Gauge and Other Instruments of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (d) Each sludge feed measuring device shall be calibrated, maintained, and operated on each working incinerator, I1-I8.
- (e) The instruments used for determining the sludge feed rates shall comply with Section C - Flow Rate Meter Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

#### D.1.13 Visible Emission Notations

- (a) Visible emission notations of the stack exhaust of each incinerator, stacks 01 - 07 shall be performed once per shift during normal daylight operations when the unit(s) are operating and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### D.1.14 Monitoring of Sewage Sludge Metal Content [40 CFR 61]

- (a) To demonstrate compliance with the Conditions in D.1.5 and D.1.6, the sewage sludge fed to the incinerators must be sampled and analyzed quarterly for beryllium and mercury content, the maximum daily sewage sludge feed rate to all incinerators, I1-I8, must be

determined, and calculations shall be performed to show that the requirements in 40 CFR Part 61, Subparts C and E are being met.

- (1) The sludge shall be sampled for mercury according to Method 105-Determination of Mercury in Wastewater Treatment Plant Sewage Sludges and for beryllium according to a method approved by the Commissioner. A total of three composite samples shall be obtained within an operating period of 24 hours. When the 24-hour operating period is not continuous, the total sampling period shall not exceed 72 hours after the first grab sample is obtained. Samples shall not be exposed to any condition that may result in beryllium or mercury contamination or loss.
  - (2) The maximum 24-hour period sludge incineration rate shall be determined by use of a flow measurement device that can measure the mass rate of sludge charged to the incinerator with an accuracy of +/- 5% over its operating range.
  - (3) The sampling, handling, preparation and analysis of sludge samples shall be accomplished according to Method 105 (40 CFR Part 61 Appendix B) for mercury and according to a method approved by the Commissioner for beryllium.
- (b) Pursuant to 40 CFR 61, Subpart E, the mercury emissions shall be determined by use of the following equation:

$$E = C Q F_{sm(avg)} / 1000$$

Where: E = Emissions of metal, grams/day  
C = Concentration of metal in sludge on a dry solids basis, micrograms/gram  
Q = Sludge charging rate, kg/day  
F<sub>sm</sub> = Weight fraction of solids in the collected sludge after mixing  
1000 = Conversion factor

## Record Keeping and Reporting Requirements

### D.1.15 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records of the results of all rolling monthly 12-month totals of the total dry tons of sewage sludge incinerated in all incinerators, I1-I8.
- (b) To document compliance with Conditions D.1.1, D.1.3, and D.1.12, the Permittee shall maintain records of the following:
  - (1) The results of all performance tests for PM and SO<sub>2</sub> for each incinerator, I1-I8.
  - (2) All readings of the following operational parameters of each scrubber used in conjunction with the incinerators, I1-I8, once per shift during normal operation when venting to the atmosphere:
    - (A) Differential static pressure of each scrubber; and
    - (B) Water flow rate of each scrubber.
- (c) To document compliance D.1.13, the Permittee shall maintain records of all visible emissions notations for each incinerator stack exhaust taken once per shift for all incinerators when in operation.

- (d) To document compliance with Conditions D.1.5, the Permittee shall maintain records of all quarterly sludge analysis for beryllium content, daily sewage sludge feed rate, and supporting emission calculations that indicate the requirements of 40 CFR Part 61, Subpart C for beryllium are being met.
- (e) To document compliance with Conditions D.1.6, the Permittee shall maintain records of all quarterly sludge analysis for mercury content, daily sewage sludge feed rate, and supporting emission calculations that indicate the requirements of 40 CFR Part 61, Subpart E for mercury are being met.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.16 Reporting Requirements

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- (a) A quarterly summary of the information to document compliance with Conditions D.1.1 - D.1.6 shall be submitted to the addresses listed in D.1.16(c) of this section, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the three (3) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). In this summary, the Permittee shall provide the following information:
  - (1) A certification that the beryllium emissions are within the 40 CFR Part 61, Subpart C standard.
  - (2) A certification that the mercury emissions are within the 40 CFR Part 61, Subpart E standard.
  - (3) A summary of all rolling monthly calculations of the 12-month totals of dry tons of sewage sludge incinerated in all incinerators, I1-I8.
  - (4) A certification that all scrubbers used in conjunction with the incinerators, I1-I8, were operated within the appropriate parameter ranges and a summary of the events in which any of the scrubbers were operating outside the appropriate parameter ranges.
  - (5) The results of the quarterly sludge analysis tests for beryllium and mercury.
- (b) The Permittee shall submit the results of the annual stack tests for particulate matter sulfur dioxide, beryllium, and mercury within 30 days of receipt of the results.
- (c) The reports required in D.1.16(a) and (b) shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206

and

Indianapolis Office of Environmental Services  
Administration Building  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

**General Construction Condition for rehabilitation of the Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I2, with a maximum sludge burning capacity of 2.6 dry tons/hr.**

**D.1.17 Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to the Significant Source Modification 097-16971-00032 and IC 13-15-5-3, the Significant Source Modification 097-16971-00032 the approval for rehabilitation becomes effective upon its issuance.

**D.1.18 Revocation of Permits [326 IAC 2-1.1-9(5)] [326 IAC 2-7-10.5(i)]**

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Pursuant to Significant Source Modification 097-16971-00032 and 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval for rehabilitation 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.

**D.1.19 Significant Source Modification [326 IAC 2-7-10.5(h)]**

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Pursuant to Significant Source Modification 097-16971-00032 the following are applicable to this approval for rehabilitation of I2 incinerator.

- (a) The affidavit of construction attached to 097-16971-00032 shall be submitted to the Office of Air Quality (OAQ), Permits Branch. If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (b) The Permittee will receive an Operation Permit Validation Letter from the Permits Branch authorizing the operation of all or part of each emissions unit covered by the affirmation in the affidavit of construction. The letter shall be attached to this source modification approval.
- (c) Prior to receiving an Operation Permit Validation Letter, the Permittee may begin operating in accordance with the conditions in this approval the emissions units covered in this Significant Source Modification approval on the date the affidavit of construction is postmarked or hand delivered to IDEM if the emissions units were constructed as proposed in the application.
- (d) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

**SECTION D.2 FACILITY OPERATION CONDITIONS -  
Three (3) Natural Gas/No. 2 Oil Boilers**

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

- (i) A Stone Johnston Corp. natural gas/No.2 fuel oil-fired boiler with serial number 843401, constructed in 1987, identified as B1, with a maximum heat input capacity of 12.6 million BTU/hr and exhausting to stack No. 08.
- (j) A Stone Johnston Corp. natural gas/No.2 fuel oil-fired boiler with serial number 843402, constructed in 1987, identified as B2, with a maximum heat input capacity of 12.6 million BTU/hr and exhausting to stack No. 09.
- (k) A Stone Johnston Corp. natural gas/No.2 fuel oil-fired boiler with serial number 843403, constructed in 1987, identified as B3, with a maximum heat input capacity of 12.6 million BTU/hr and exhausting to stack No. 10.

(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)]**

**D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2(b)]**

Pursuant to 326 IAC 6-1-2 (b), (Particulate emission limitations for fuel combustion steam generators), the particulate matter emissions from each of the three (3) 12.6 MMBtu per hour natural gas/No. 2 fuel oil boilers shall be limited as follows:

- (a) Particulate matter emissions from each boiler shall not exceed 0.15 pounds per million British thermal units heat input when combusting No. 2 fuel oil; and
- (b) Particulate matter emissions from each boiler shall not exceed 0.01 grains per dry standard cubic foot when combusting natural gas.

**D.2.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1][326 IAC 7-2-1]**

Pursuant to 326 IAC 7-1.1-1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from each of the three (3) 12.6 MMBtu per hour natural gas/No. 2 fuel oil-fired boilers shall not exceed five tenths (0.5) pounds per MMBtu heat input when combusting No. 2 fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average. 326 IAC 7-1.1 and 326 IAC 7-2-1 are not federally enforceable.

**D.2.3 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 2-2]**

The sulfur dioxide emissions from the three (3) 12.6 MMBtu per hour natural gas/No. 2 fuel oil-fired boilers will be limited to less than 40 tons per year which will render 326 IAC 2-2 (PSD Rules) and not applicable. The source will be in compliance with this limitation by limiting the total amount of No. 2 fuel oil burned in all three boilers during any 12-month period to less than or equal to 1,060,000 gallons and by limiting the sulfur content of the fuel oil burned to less than or equal to 0.5% sulfur by weight.

**D.2.4 Regulation Non-applicability [326 IAC 12][40 CFR 60]**

B1, B2, and B3 are not subject to the requirements of 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units) because they were constructed prior to June 8, 1989, the applicability date of this rule.

**D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan of this permit, is required for these facilities and any control devices.

### **Compliance Determination Requirements**

#### **D.2.6 Sulfur Dioxide Emissions and Sulfur Content**

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Compliance with Condition D.2.2 and D.2.3 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:
  - (1) Providing vendor analysis of fuel oil delivered, if accompanied by a vendor certification, or;
  - (2) Analyzing the fuel oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 12.6 MMBtu per hour boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

#### **D.2.7 Visible Emission Notations**

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- (a) Visible emission notations of the stack exhaust from each of the three (3) boilers shall be performed once per shift during normal daylight operations when exhausting to the atmosphere when combusting No. 2 fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

### **D.2.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Calendar dates covered in the compliance determination period;
  - (2) Actual No. 2 fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust(s) once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.9 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.2.2 and D.2.3 in any compliance period when No. 2 fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the three (3) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### SECTION D.3

### FACILITY OPERATION CONDITIONS - POTW

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

- (l) Wastewater treatment operations which includes plant influent systems, headworks trash rake building, headworks raw sewage pump building, headworks bar screen building, headworks grit chambers, southport gate structure, primary treatment systems, grease and scum building, primary effluent diversion structure, pig retrieval structure, bio-roughing, nitrification system, effluent filter building and disinfection system, dissolved air flotation, gravity thickening, and dewatering operations.

(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)]

##### D.3.1 Regulation Non-applicability [326 IAC 20-1][40 CFR 63, Subpart VVV]

- (1) The wastewater treatment operations are not subject to the requirements of 40 CFR 63, Subpart VVV (National Emissions Standards for Hazardous Air Pollutants: Publicly Owned Treatment Works) because this source is not a major source of hazardous air pollutants (HAPs) as defined in 326 IAC 2-7-1(22) and is not an industrial publicly owned treatment works (POTW) as defined in 40 CFR 63.1595.
- (2) Any change or modification that would increase the potential to emit of a single hazardous air pollutant to ten (10) tons per year or any change or modification that would increase the potential to emit of a combination of HAPs to twenty-five (25) tons per year will require prior approval from IDEM, OAQ.

##### D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan of this permit, is required for this facility and any control devices.

## SECTION D.4 FACILITY OPERATION CONDITIONS - Insignificant Activities

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(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)]

#### D.4.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a), (Particulate Emission Limitations for General Sources), the particulate matter emissions from the brazing, soldering and welding equipment, cutting torches, grinding and machining operations shall not exceed 0.03 grain per dry standard cubic foot (dscf).

#### D.4.2 Volatile Organic Compounds (VOC)

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.4.3 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility, construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
Office of Air Quality**

**AND INDIANAPOLIS OFFICE OF ENVIRONMENTAL  
SERVICES**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: City of Indianapolis, Belmont Advanced Wastewater Treatment Plant  
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Part 70 Permit No.: T097-5989-00032

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

Please check what document is being certified:

- ? Annual Compliance Certification Letter
- ? Test Result (specify) \_\_\_\_\_
- ? Report (specify) \_\_\_\_\_
- ? Notification (specify) \_\_\_\_\_
- ? Affidavit (specify) \_\_\_\_\_
- ? Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**Office of Air Quality  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**and  
Indianapolis Office of Environmental Services  
Administrative Building  
2700 South Belmont Drive  
Indianapolis, Indiana 46221**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: City of Indianapolis, Belmont Advanced Wastewater Treatment Plant  
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Part 70 Permit No.: T097-5989-00032

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p>? This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>? The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>? The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--|

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**Office of Air Quality**  
**Compliance Data Section**  
**AND INDIANAPOLIS OFFICE OF ENVIRONMENTAL**  
**SERVICES**

**PART 70 OPERATING PERMIT**  
**SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: City of Indianapolis, Belmont Advanced Wastewater Treatment Plant  
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Part 70 Permit No.: T097-5989-00032

?	Natural Gas Only
?	Alternate Fuel burned
	From: _____ To: _____

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:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 Office of Air Quality  
 Compliance Data Section  
 AND INDIANAPOLIS OFFICE OF ENVIRONMENTAL  
 SERVICES**

**Part 70 Quarterly Sludge Feed Rate Report**

Source Name: City of Indianapolis, Belmont Advanced Wastewater Treatment Plant  
 Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
 Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
 Part 70 Permit No.: T097-5989-00032  
 Facility: Sewage Sludge Incinerators, I1-I8  
 Parameter: Sewage Sludge Feed Rate  
 Limit: Total Sewage Sludge Incinerated in all incinerators shall not exceed 62,050 dry tons per 12 consecutive month period

YEAR: \_\_\_\_\_

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

? No deviation occurred in this 3 month period.

? Deviation/s occurred in this .  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 Office of Air Quality  
 Compliance Data Section  
 AND INDIANAPOLIS OFFICE OF ENVIRONMENTAL  
 SERVICES**

**Part 70 Quarterly Sludge Feed Rate Report - I2**

Source Name: City of Indianapolis Belmont Advanced Wastewater Treatment Facility/  
 Indianapolis Sludge Incinerator  
 Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
 Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
 Source Modification No.: T097-5989-00032  
 Facility: No. 2 incinerator  
 Parameter: Amount of sludge delivered to the No. 2 incinerator  
 Limit: 17,712 tons per twelve (12) consecutive month period, with compliance  
 determined at the end of each month, equivalent to a CO emission limitation of  
 less than 458.58 tons per year

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Sludge burned (tons)	Sludge burned (tons)	Sludge burned (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this 3 month period.

? Deviation/s occurred in this .  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**Office of Air Quality**  
**Compliance Data Section**  
**AND INDIANAPOLIS OFFICE OF ENVIRONMENTAL**  
**SERVICES**

**Part 70 Quarterly No. 2 Fuel Oil Usage Report**

Source Name: City of Indianapolis, Belmont Advanced Wastewater Treatment Plant  
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Part 70 Permit No.: T097-5989-00032  
Facility: Three 12 MMBtu/hour boilers  
Parameter: No. 2 fuel oil usage per year  
Limit: Total amount of No. 2 fuel oil combusted in all three boilers during any 12-month period shall not exceed 1,060,000 gallons.

YEAR: \_\_\_\_\_

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

? No deviation occurred in this 3 month period.

? Deviation/s occurred in this .  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 Office of Air Quality  
 Compliance Data Section  
 AND  
 Indianapolis Office of Environmental Services**

**PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: City of Indianapolis, Belmont Advanced Wastewater Treatment Plant  
 Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
 Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
 Part 70 Permit No.: T097-5989-00032

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

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

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

Form Completed By: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.



## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for Part 70 Permit

#### Source Background and Description

Source Name: City of Indianapolis, Belmont Advanced Wastewater Treatment Plant  
Source Location: 2700 South Belmont Ave., Indianapolis, IN 46221  
County: Marion  
SIC Code: 4952  
Operation Permit No.: T097-5989-00032  
Permit Reviewer: ERG and Kathy Moore

On February 6, 2002, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star & News in Indianapolis, Indiana, stating that City of Indianapolis, Belmont Advanced Wastewater Treatment Plant had applied for a Part 70 Permit to operate a municipal wastewater treatment plant, including sludge incinerators, for the city of Indianapolis. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of forty-five (45) days to provide comments on whether or not this permit should be issued as proposed.

On February 19, 2002, the Office of Air Quality held a public meeting for interested parties to comment and ask questions about the proposed permit.

On March 21, 2002, the Department of Public Works submitted comments on the proposed Part 70 Permit. The summary of the comments is as follows:

#### Comment 1:

The source stated that the Permittee should be designated as "City of Indianapolis, Belmont Advanced Wastewater Treatment Plant" instead of "Belmont Advanced Wastewater Treatment Plant."

#### Response to Comment 1:

The Permittee name was changed from "Belmont Advanced Wastewater Treatment Plant" to "City of Indianapolis, Belmont Advanced Wastewater Treatment Plant" on the cover page of the permit, the header on each page of the permit, and on each report form located at the back of the permit. The Permittee name was not changed in the Technical Support Document (TSD) or calculations because the OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

#### Comment 2:

The source requested that the responsible official be changed to "Deputy Director of Operations - Department of Public Works, City of Indianapolis." The source also requested that the general source phone number be changed to (317)639-7000 and that it be stated that the phone number is for the offices of contract operator for City of Indianapolis - White River Environmental Partnership.

### Response to Comment 2:

The following change was made as a result of this comment:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary municipal waste water treatment plant with sewage sludge incinerators.

Responsible Official: **Gregory L. Henneke, Deputy Director of Operations - City of Indianapolis Department of Capital Asset Management and Department of Public Works, City of Indianapolis**

Source Address: 2700 Belmont Avenue, Indianapolis, IN 46221

Mailing Address: 2700 Belmont Avenue, Indianapolis, IN 46221

General Source Phone Number: **317-327-2200639-7000 (offices of contract operator for City of Indianapolis - White River Environmental Partnership)**

### Comment 3:

The source noted that the emission unit descriptions in A.2(a) through (d) and Section D.1(a) through (d) be changed to state that the units exhaust to only one of the stacks listed at a time. They do not exhaust to both stacks at the same time. There is one main stack (No. 1) that all four incinerators (I1-I4) vent to after control equipment. Each incinerator also has its own stack (Nos. 2-5) that they can vent to during times of main stack maintenance. These stacks are also after the control equipment. Incinerators I1-I3 are controlled by a Swemco venturi scrubber and also a tray impingement scrubber. Incinerator I4 is controlled by a Venturi-Pak scrubber.

### Response to Comment 3:

The following change was made as a result of this comment:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I1, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I1 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I1, exhausts to stacks No. 01 ~~and or~~ No. 02.
- (b) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I2, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I2 with a capacity of 22.5

million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I2, exhausts to stacks No. 01 ~~and or~~ No. 03.

- (c) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I3, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I3 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I3, exhausts to stacks No. 01 ~~and or~~ No. 04.
- (d) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I4, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I4 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a ~~Swemco venturi and tray impingement~~ **Venturi-Pak** scrubber. Incinerator, I4, exhausts to stacks No. 01 ~~and or~~ No. 05.

**SECTION D.1**

**FACILITY OPERATION CONDITIONS -  
Sewage Sludge Incinerators, I1 - I8**

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

- (a) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I1, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I1 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I1, exhausts to stacks No. 01 ~~and~~ or No. 02.
- (b) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I2, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I2 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I2, exhausts to stacks No. 01 ~~and~~ or No. 03.
- (c) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I3, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I3 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I3, exhausts to stacks No. 01 ~~and~~ or No. 04.
- (d) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I4, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I4 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a ~~Swemco venturi and tray impingement~~ **Venturi-Pak** scrubber. Incinerator, I4, exhausts to stacks No. 01 ~~and~~ or No. 05.

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

**Comment 4:**

The source believes that reporting requirements are inconsistent throughout the permit. The source feels that notifications should only be required to be submitted to IDEM. as Indianapolis Environmental Resources Management Division does not have any authority over air permits. The source would like all references to the Indianapolis Environmental Resources Management Division in Conditions B.7 (Duty to Supplement and Provide Information), C.21 (General Reporting Requirements), and D.1.13(c) (Reporting Requirements) to be removed.

**Response to Comment 4:**

No change has been made as a result of this comment. IDEM, OAQ has determined that the Indianapolis local agency Indianapolis Environmental Resource Management Division (ERMD) should be copied on various notifications and reports described in Conditions B.7 (Duty to Supplement and Provide Information), C.20 (General Reporting Requirements), and D.1.13(c) (now Condition D.1.14(c)) (Reporting Requirements). The purpose of copying the local agency in these instances is intended to be for informational purposes only as the local agency is not the permitting authority for this source. Since the ERMD is not the permitting authority, the ERMD was not copied on notifications to be used directly for compliance or enforcement purposes. These notifications include those required in Condition B.10 (Annual Compliance

Certification), B.11 (Preventive Maintenance Plan), B.12 (Emergency Provisions), B.15 (Deviations from Permit Requirements and Conditions), B.17 (Permit Renewal), B.18 (Permit Amendment or Modification), B.20 (Operational Flexibility), B.23 (Transfer of Ownership or Operational Control), C.7 (Asbestos Abatement Projects), C.8 (Performance Testing), C.10 (Compliance Monitoring), and C.18 (Emission Statement). Throughout the permit, the name of the local agency has been changed from "Indianapolis Environmental Resources Management Division" to "Indianapolis Office of Environmental Services (Indianapolis OES)"

**Comment 5:**

The source is under the impression that the permit shield provisions of Condition B.13 (Permit Shield) apply only to the extent that specific determinations are incorporated into the permit (and that such determinations contained in the Technical Support Document are not covered by this condition). For this reason, the source requests that the following applicability determinations from the TSD be included in this condition:

- (h) The facility is not subject to NSPS Subpart O - Standards of Performance for Sewage Treatment Plants.
- (i) The facility is not subject to NESHAP Subpart VVV - Standards for Publicly Owned Treatment Works.
- (j) The facility is not subject to NSPS Subpart E - Standards of Performance for Incinerators.
- (k) The boilers are not subject to NSPS Subpart Dc - Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units.
- (l) The boilers are not subject to Prevention of Significant Deterioration Rules.

**Response to Comment 5:**

In order to be clear about what units the non-applicability determinations apply to, this change was made in the individual D sections rather than in Condition B.13 as suggested by the source. All condition numbers and the Table of Contents were updated as needed. On September 2, 2002, February 5 and February 18, 2003, additional information was provided by the City of Indianapolis, Department of Public works to show that the source is not subject to the NESHAP 40 CFR 63, Subpart VVV - Standards for Publicly Owned Treatment Works. This information included verification that Belmont Advanced Wastewater Treatment plant is not a major source of hazardous air pollutants and certifying that it is not an industrial publicly owned treatment works (POTW) as defined in 40 CFR 63.1595 because the City of Indianapolis has not received any notifications from industrial dischargers of their intent to utilize Belmont Advanced Wastewater Treatment plant for compliance with an industrial NESHAP. In addition, Section A.1, Source Status has been revised to indicate Belmont AWTP is a minor source of HAPs, a description of the wastewater treatment operation has been added to Section A.2 Emission Units and Pollution Control Equipment Summary, and a new D section has been added to include the description of the wastewater treatment operation as well as a non-applicability determination condition.

The TSD was not changed to correct the error that the entire source is a major source of hazardous air pollutants (HAPs) because the OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]  
Source Status: Part 70 Permit Program

Major Source, under PSD Rules;  
**Minor** Major Source, Section 112 of the Clean Air Act

**D.1.7 Regulation Non-applicability [326 IAC 12][40 CFR 60]**

- (a) Incinerators I1, I2, I3, and I4 are not subject to the requirements of 40 CFR 60, Subpart O (Standards of Performance for Sewage Treatment Plants) because the incinerators were constructed prior to June 11, 1973, the applicability date of this rule.
- (b) Incinerators I1, I2, I3, and I4 are not subject to the requirements of 40 CFR 60, Subpart E (Standards of Performance for Incinerators) because the incinerators were constructed prior to August 17, 1971, the applicability date of this rule.

**D.2.4 Regulation Non-applicability [326 IAC 12][40 CFR 60]**

B1, B2, and B3 are not subject to the requirements of 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units) because they were constructed prior to June 8, 1989, the applicability date of this rule.

**D.2.78 Record Keeping Requirements**

- (a) To document compliance with Conditions D.2.2 and D.2.3 and ~~D.2.5~~, the Permittee shall maintain records in accordance with (1) through (6) below.

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]**

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

- (I) **Wastewater treatment operations which includes plant influent systems, headworks trash rake building, headworks raw sewage pump building, headworks bar screen building, headworks grit chambers, southport gate structure, primary treatment systems, grease and scum building, primary effluent diversion structure, pig retrieval structure, bio-roughing, nitrification system, effluent filter building and disinfection system, dissolved air flotation, gravity thickening, and dewatering operations.**

**SECTION D.3 FACILITY OPERATION CONDITIONS - POTW**

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

- (I) **Wastewater treatment operations which includes plant influent systems, headworks trash rake building, headworks raw sewage pump building, headworks bar screen building, headworks grit chambers, southport gate structure, primary treatment systems, grease and scum building, primary effluent diversion structure, pig retrieval structure, bio-roughing, nitrification system, effluent filter building and disinfection system, dissolved air flotation, gravity thickening, and dewatering operations.**

**(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)]**

**D.3.1 Regulation Non-applicability [326 IAC 20][40 CFR 63, Subpart VVV]**

- (a) The wastewater treatment operations are not subject to the requirements of 40 CFR 63, Subpart VVV (National Emissions because this source is not a major source of hazardous air pollutants (HAPs) as defined in 326 IAC 2-7-1(22) and is not an industrial publicly owned treatment works (POTW) as defined in 40 CFR 63.1595.
- (b) Any change or modification that would increase the potential to emit of a single hazardous air pollutant to ten (10) tons per year or any change or modification that would increase the potential to emit of a combination of HAPs to twenty-five (25) tons per year will require prior approval from IDEM, OAQ.

**D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for this facility and any control devices.

**Comment 6:**

The source noted that Condition C.11(a)(Maintenance of Sludge Feed Monitoring Equipment) is structured to be specifically applicable to sludge feed monitoring equipment only. For this reason, the source requests that the last sentence (which refers to continuous monitoring) be deleted.

**Response to Comment 6:**

The IDEM, OAQ has completely removed the sludge feed monitoring equipment breakdown condition because the feed equipment is integral to the process and no sludge is fed to the incinerator in the event of the breakdown of this equipment. This change is shown at the end of this document in changes to Section C.

**Comment 7:**

The source recommends that Condition C.12 (Maintenance of Emission Monitoring Equipment), which refers to maintenance of emission monitoring equipment, be deleted as there is no emission monitoring equipment on any of the emission units covered by this permit. The CEMS system measures total hydrocarbon (THC) and THC is not regulated by the air rules, but by 40 CFR 503, a water rule.

**Response to Comment 7:**

IDEM agrees that Condition C.12 (Maintenance of Emission Monitoring Equipment) should be removed from the permit because there are no continuous monitors for emissions at this source. Therefore, the following changes were made to the permit. The Table of Contents was updated as needed.

~~C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

- ~~(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should~~

~~be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.~~

- ~~(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

**Comment 8:**

The source noted that Condition C.14 (Pressure Gauge and Other Instrument Specifications), now Condition C.12, requires that the sludge feed rate monitoring be conducted to  $\pm 2\%$  accuracy (of full scale readings) while Condition D.1.11(a)(2) (Monitoring of Sewage Sludge Metal Content) (now Condition D.1.12(a)(2)) indicates that the feed rate shall be determined to within an accuracy of  $\pm 5\%$ . The sludge feed rate monitoring equipment is old and not reliable within those ranges. The City is in the process of implementing a capital improvement project to update this equipment. The new equipment will be able to meet the 5% accuracy requirement. The source believes that the  $\pm 5\%$  accuracy requirement is not appropriate or achievable for the antiquated sludge feed monitoring system and the source requests that Condition C.14, now Condition C.12 and Condition D.1.11 now Condition D.1.12 be changed to  $\pm 20\%$  accuracy.

**Response to Comment 8:**

Condition C.12 has been revised to ensure that the requirements in the two conditions did not contradict each other. Condition D.1.12, which states the requirement of  $\pm 5\%$ , is consistent with the requirement in 40 CFR 61.54 (NSPS, Subpart E - National Emission Standard for Mercury) and is a requirement from an old permit for this source. In this permit, the accuracy of the flow measurement device is updated to require accuracy to within  $\pm 5\%$ . Conditions C.12 and D.1.12 were not changed to state that the flow measurement device must be accurate to within  $\pm 20\%$  instead of  $\pm 5\%$ . Since monitoring of the sludge rate is necessary to determine compliance with permit limits, the device measuring the sludge rate must be accurate so that an accurate compliance determination is made. An accuracy of  $\pm 20\%$  is not sufficient to allow for accurate compliance determination. Therefore, the following change was made to Condition C.12:

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus ~~two~~ **five** percent ( $\pm 25\%$ ) of full scale reading.

**Comment 9:**

The source believes that the units in Condition D.1.1 (Particulate Matter) should be limited to 0.03 grains/dscf and 17.9 tons per year. The source feels that the current wording of the condition is poor because, pursuant to 326 IAC 6-1-12, units 5-8 are limited to 0.03 grains/dscf and 17.9 tons per year and units 1-4 are limited to 0.03 grains/dscf and 72.5 tons per year.

**Response to Comment 9:**

As a result of this comment, Condition D.1.1 (Particulate Matter) was changed to clarify its intent.

**D.1.1 Particulate Matter [326 IAC 6-1-12(a)] [326 IAC 2-3]**

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- (a) Pursuant to 326 IAC 6-1-12(a) (Marion county particulate matter emission limitations), the total particulate matter emissions from incinerators I1, I2, I3, and I4 shall not exceed 72.5 tons per year and the **emission rate shall not exceed 0.030 grains/dscf. The particulate matter** emissions from each individual incinerator for I5, I6, I7, and I8 shall not exceed 17.9 tons per year ~~or~~ **and the emission rate shall not exceed 0.030 grains/dscf.**
  
- (b) Pursuant to Emission Offset Limits, **326 IAC 2-3**, established by the Indianapolis OES in the City of Indianapolis operating permit which was issued on August 21, 1990, the total particulate matter emissions from all incinerators I1-I8 shall not exceed 40.3 tons per year and the total amount of sewage sludge incinerated by all incinerators, I1-I8, shall not exceed 62,050 dry tons of sludge per any 12-month period.

**Comment 10:**

The source believes that when reviewing 40 CFR 61, Subpart C, it is not clear whether this standard is intended to be applicable to all units combined, as Condition D.1.4 (Beryllium) is currently written, or to limit emissions to 10 grains per 24-hour period for each of the incinerators. The source requests that IDEM review the applicability of this limit.

**Response to Comment 10:**

The basis for the emission standards contained in both 40 CFR 61, Subpart C (National Emission Standard for Beryllium) and 40 CFR 61, Subpart E (National Emission Standard for Mercury) was maintenance of ambient air quality in the area. It is because of this basis for the regulations that the emission limitations provided in the regulations apply to the incinerators combined as a group rather than the individual incinerators. This is clearly spelled out specifically for 40 CFR 60, Subpart E in a letter from the Director of the Division of Stationary Source Enforcement (EPA) dated August 12, 1977. Although this letter is specifically for Subpart E, the intent and regulatory basis for the two rules is the same. Therefore, no changes were made as a result of this comment.

**Comment 11:**

The source provided a number of comments on the testing requirements contained in Condition D.1.7 (now Condition D.1.9). These comments are listed below:

- (a) The source noted that units I5/I6 and I7/I8 are not currently in operation and there are no plans to operate them. The source requests that it be clearly identified in Condition D.1.7(a) (Testing Requirements) (now Condition D.1.9(a)) that these units are not required to be stack tested.
  
- (b) The source would like to know the regulatory basis for testing each incinerator in Condition D.1.7(a) (Testing Requirements) (now Condition D.1.9(a)). The incinerators share common control devices

and on any given day would be burning sludge of the same quality that was consumed in another unit.

- (c) The source believes that the mercury testing in Condition D.1.7(a) (Testing Requirements) (now Condition D.1.9(a)) should be deleted. Mercury sampling (per Condition D.1.11 (Monitoring of Sewage Sludge Metal Content, now Condition D.1.12) is used to demonstrate compliance with mercury limits, not stack test results.
- (d) The source believes that it is not necessary to require compliance stack tests from each of the incinerators every year as required in Condition D.1.7(b) (Testing Requirements) (now Condition D.1.9(a)). The source believes that tests performed once per permit term is more consistent with IDEM's policy on stack testing for units of this size. Additionally, the stacks are essentially the same so the source proposes that one of the five stacks (numbered 1-5) should be tested every year, as all stacks would be tested during the 5-year permit duration. The source feels that there is no benefit to test each stack each year due to their similar nature. Annual testing would cause a great expense to the City and residents of Indianapolis with no net benefit.

**Response to Comment 11:**

- (a) Since I5/I6 and I7/I8 are not currently in operation, Condition D.1.9(b) was changed to require testing of these units only if these units are operated in the future.
- (b) The testing is required to demonstrate compliance with permit limits. Condition D.1.1 contains PM limitations pursuant to 326 IAC 6-1-12 and 326 IAC 2-3. Condition D.1.2 contains sulfur dioxide limitations pursuant to 326 IAC 7-4-2. Conditions D.1.4 and D.1.5 contain beryllium and mercury limitations pursuant to 40 CFR 61, Subpart C and E, respectively. The Permittee shall perform testing to demonstrate compliance with the limitations included in these conditions. The purpose of the Title V program is to include requirements to ensure continuous compliance with permit limits.
- (c) The requirement for mercury testing will not be removed from the permit. This requirement is in the permit, even though the NESHAP does not specifically require it, because the testing is necessary to determine compliance with the NESHAP limits. The purpose of the Title V program is to include requirements to ensure continuous compliance with permit limits.
- (a) The testing frequency was altered to require testing on a yearly basis for the first permit term. After the first permit term, testing shall be performed once every 2.5 years. The testing requirements were not altered to allow the Permittee to test only one incinerator each year. There are too many variables affecting whether all the units are similar. The Permittee can work with IDEM when testing is required to develop a protocol for testing.

These comments as a group resulted in the following changes to Condition D.1.9 (Testing Requirements):

**D.1.79 Testing Requirements [326 IAC 2-7-6(1)(6)] [326 IAC 2-1.1-11]**

- (a) **Testing Requirements for I1, I2, I3, and I4:** During the period between 6 and 12 months after issuance of this **Part 70** permit, the Permittee shall perform the following tests in accordance with 326 IAC 3-6:
  - (1) PM testing; Each incinerator shall be tested using ~~a method~~ **methods** approved by the Commissioner.

- (2) SO<sub>2</sub> testing; Each incinerator shall be tested using ~~a method~~ **methods** approved by the Commissioner.
- (3) Beryllium testing; Each incinerator shall be tested using ~~a method~~ **methods** approved by the Commissioner.
- (4) Mercury testing; Each incinerator shall be tested using ~~a method~~ **methods** approved by the Commissioner.

**During the first permit term, these tests shall be repeated once every year from the date of this valid compliance demonstration. After the first permit term, these tests shall be repeated once every 2.5 years from the date of this valid compliance demonstration.**

- (b) Testing Requirements for I5/I6 and I7/I8: If the operations at I5/I6 or I7/I8 are restarted, the Permittee shall perform the following tests in accordance with 326 IAC 3-6 within 60 days of commencement of operation, but no later than 180 days after start-up:**
- (1) PM testing; Using methods approved by the Commissioner.**
  - (2) SO<sub>2</sub> testing; Using methods approved by the Commissioner.**
  - (3) Beryllium testing; Using methods approved by the Commissioner.**
  - (4) Mercury testing; Using methods approved by the Commissioner.**

**If the operations at I5/I6 or I7/I8 are restarted, these tests shall be repeated once every year from the date of last valid compliance test during the permit term. For any year that the units I5/I6 or I7/I8 are not in operation for the entire year, the Permittee can delay the repeat testing until the subsequent anniversary of last valid compliance test.**

- ~~(b) These tests shall be repeated every year from the date of these valid compliance demonstrations.~~
- (c) ~~In addition to these requirements, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, eCompliance shall be determined by a performance test in accordance with Section C - Performance Testing.~~

**Comment 12:**

The source noted that pressure drops will vary for each incinerator since each one has its own scrubber. The permit, as currently written, lists water flow rates that are far below actual flow rates. The listed range of 38-50 gallons per minute is clearly not a flow rate range. The source submitted the following flow rates and pressure drops:

Incinerator I1, I2, and I3: minimum pressure drop: 20 inches of water  
minimum flow rate - 700 gallons per minute

Incinerator I4:	minimum pressure drop: 18 inches of water minimum flow rate - 600 gallons per minute
Incinerator I5, I6, I7, and I8:	minimum pressure drop: 18 inches of water minimum flow rate - 400 gallons per minute

The source feels that the pressure drops and flow rates should be minimums that should be maintained as the main issue is not to drop below a certain point. The higher the flows and pressure drops, the more efficiently the control equipment operates. The source would like Condition D.1.9 (Parametric Monitoring) (now Condition D.1.12) to be corrected to reflect this information.

#### Response to Comment 12:

IDEM has revised the ranges in condition D.1.9 (now condition D.1.12) and have also revised language to clearly separate the water flow monitors and sludge flow monitors. The following changes were made to this condition:

#### D.1.912 Parametric Monitoring

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- (a) The Permittee shall record the total static pressure drop across the scrubber used in conjunction with each of the incinerators, I1-I8, at least once per shift when the incinerator(s) are in operation. When for any one reading, the pressure drop across each scrubber is ~~outside less than~~ the normal ~~range minimum~~ of ~~38 to 42~~ **20** inches of water **for incinerators I1, I2, and I3, or 18 inches of water for incinerators I4, I5, I6, I7, and I8**, or a ~~range minimum~~ established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is ~~outside the above~~ **below the** mentioned ~~range minimum~~ is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall record the water flow rate through each scrubber used in conjunction with each of the incinerators, I1-I8, at least once per shift when the incinerator(s) are in operation. When for any one reading, the water flow rate through each scrubber is ~~outside less than~~ the normal ~~range minimum~~ of ~~38 to 50~~ **700** gallons per minute **for incinerators I1, I2 and I3, or 600 gallons per minute for incinerator I4, or 400 gallons per minute for incinerators I5, I6, I7, and I8**, or a ~~range minimum~~ established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A water flow rate reading that is ~~outside the above~~ **below the** mentioned ~~range minimum~~ is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) The instruments used for determining the pressure and flow rates **through the scrubber** shall comply with Section C - Pressure Gauge and Other Instruments of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (d) Each sludge ~~flow feed~~ measuring device shall be calibrated, maintained, and operated on each working incinerator, I1-I8.

- (e) The instruments used for determining the sludge feed rates ~~and water flow rates through each scrubber~~ shall comply with Section C - Flow Rate Meter Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

**Comment 13:**

The source noted that the equation provided in Condition D.1.11(a)(4) (Monitoring of Sewage Sludge Metal Content) (now Condition D.1.14(a)(4)) is only applicable to the quantification of mercury emissions. For this reason, the source requests that the reference to beryllium be deleted from the condition.

**Response to Comment 13:**

The following changes were made as a result of this comment.

**D.1.14 Monitoring of Sewage Sludge Metal Content**

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- (a) To demonstrate compliance with the Conditions in D.1.5 and D.1.6, the sewage sludge fed to the incinerators must be sampled and analyzed quarterly for beryllium and mercury content. The maximum daily sewage sludge feed rate to all incinerators, 11-18, must be determined, and calculations shall be performed to show that the requirements in 40 CFR Part 61, Subparts C and E are being met.

- (1) The sludge shall be sampled for mercury according to Method 105-Determination of Mercury in Wastewater Treatment Plant Sewage Sludges and for beryllium according to a method approved by the Commissioner. A total of three composite samples shall be obtained within an operating period of 24 hours. When the 24-hour operating period is not continuous, the total sampling period shall not exceed 72 hours after the first grab sample is obtained. Samples shall not be exposed to any condition that may result in beryllium or mercury contamination or loss.
- (2) The maximum 24-hour period sludge incineration rate shall be determined by use of a flow measurement device that can measure the mass rate of sludge charged to the incinerator with an accuracy of +/- 5% over its operating range.
- (3) The sampling, handling, preparation and analysis of sludge samples shall be accomplished according to Method 105 (40 CFR Part 61 Appendix B) for mercury and according to a method approved by the Commissioner for beryllium.

**(b) Pursuant to 40 CFR 61, Subpart E,**

- ~~(4) The beryllium and the mercury emissions shall be determined by use of the following equation (from 40 CFR Part 61, Subpart E):~~

$$E = C Q F_{sm(avg)} / 1000$$

Where: E = Emissions of metal, grams/day  
C = Concentration of metal in sludge on a dry solids basis, micrograms/gram  
Q = Sludge charging rate, kg/day  
F<sub>sm</sub> = Weight fraction of solids in the collected sludge after mixing  
1000 = Conversion factor

**Comment 14:**

The source noted that Condition D.1.12(c) (Record Keeping Requirements) (now Condition D.1.15(c)) states that records of visible emission notations be maintained “for each incinerator.” The source requests that the language in this condition be changed to require records “for each incinerator stack” since some incinerators exhaust from common stacks.

**Response to Comment 14:**

The following change was made as a result of this comment:

**D.1.1215 Record Keeping Requirements**

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- (c) To document compliance D.1.4011, the Permittee shall maintain records of all visible emissions notations for each incinerator, ~~11-18~~, stack exhaust taken once per shift for all incinerators when in operation.

**Comment 15:**

The source noted that Condition D.1.13(a)(5) (Reporting Requirements) (now Condition D.1.15(a)(5)) requires records of exceedances of the 30% opacity threshold. Since there is not opacity monitoring conducted for these units, there are no opacity records for these units. The source requests that this requirement be deleted.

**Response to Comment 15:**

The condition requiring reports of exceedances of the 30% opacity limitation was removed from the permit as this reporting requirement is not necessary at this time.

**D.1.15 Reporting Requirements**

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- (a) A quarterly summary of the information to document compliance with Conditions D.1.1 - D.1.6 shall be submitted to the addresses listed in D.1.16(c) of this section, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the three (3) month period being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). In this summary, the Permittee shall provide the following information:
- (1) A certification that the beryllium emissions are within the 40 CFR Part 61, Subpart C standard.
  - (2) A certification that the mercury emissions are within the 40 CFR Part 61, Subpart E standard.
  - (3) A summary of all rolling monthly calculations of the 12-month totals of dry tons of sewage sludge incinerated in all incinerators, 11-18.
  - (4) A certification that all scrubbers used in conjunction with the incinerators, 11-18, were operated within the appropriate parameter ranges and a summary of the events in which any of the scrubbers were operating outside the appropriate parameter ranges.

~~(5) Any exceedences of the 30% opacity threshold and the corrective actions taken during these exceedences.~~

(65) The results of the quarterly sludge analysis tests for beryllium and mercury.

**Comment 16:**

The source requests that the changes to the emission unit descriptions also be made in the Technical Support Document.

**Response to Comment 16:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. For these reasons, no change was made as a result of this comment.

**Comment 17:**

The source noted that the TSD indicates that the three boilers at the source were constructed without necessary Construction Permits and that IDEM "is reviewing this matter and will take appropriate action." The source believes that these units qualify under the Indiana Limited Liability Statute and under the IDEM Amnesty Policy. The source requests that IDEM acknowledge this fact in the TSD.

**Response to Comment 17:**

IDEM is currently reviewing the enforcement issue. Until a decision has been reached by IDEM, OAQ, the TSD should state that IDEM "is reviewing this matter and will take appropriate action." Additionally, the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. For these reasons, no change was made as a result of this comment.

**Comment 18:**

The source requested that the second regulatory notification listed under Federal Rule Applicability (f)(3) and (g)(3) in the TSD be deleted for the reasons mentioned in Comment 4.

**Response to Comment 18:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. For these reasons, no change was made as a result of this comment.

**Comment 19:**

The source noted that (b) under Federal Rule Applicability in the TSD states that "This source is not subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Publicly Owned Treatment Works. 326 IAC 14 (40 CFR 63.1580 through 63.1595. Subpart VVV) because the affected facility is not a major source of HAP emissions. This rule applies only to publicly owned treatment works. While the entire Belmont source is a major source of HAP, the POTW facility is not." The source would like to know how this statement is relevant to the HAPs PTE table on page 5 of the TSD. Additional information submitted on September 2, 2002, February 5 and February 18, 2003 documents that this source is not a major source of HAPs.

**Response to Comment 19:**

The PTE table on page 5 of the TSD shows the HAP emissions from the incinerators prior to control. The statement in the TSD that says the source is not subject to 40 CFR 63, Subpart VVV because the POTW facility is not a major source is incorrect. The applicability of 40 CFR 63, Subpart VVV as stated in 40 CFR 63.1580 is: (1) The Permittee owns or operates a publicly owned treatment works (POTW) that includes an affected source as defined in 40 CFR 63.1595; (2) The affected source is located at a POTW which is a major source of HAP emissions, or at any industrial POTW regardless of whether or not it is a major source of HAP; and (3) The POTW is required to develop a pretreatment program as defined by 40 CFR 403.8 (for a POTW owned or operated by a municipality, State, or intermunicipal or interstate agency), or the POTW would meet the general criteria for development and implementation of a pretreatment program (for a POTW owned or operated by a department, agency, or instrumentality of the Federal government. Based on information provided by the City of Indianapolis, Department of Public Works, Belmont Advanced Wastewater Treatment Plant is not a major source of HAPs and does not meet the definition of an industrial POTW in 40 CFR 63.1595, therefore is not subject to 40 CFR 63, Subpart VVV. Additional calculations have been included as the TSD Addendum Appendix A to document the source is not a major source of HAPs.

The TSD was not changed to correct the error that the entire source is a major source of HAPs because the OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

**Comment 20:**

The source feels that the Limited Potential to Emit table should not have a PM10 limit. The source would also like to know what "wastewater treatment operations < 1950 limited to less than 25/40 or 100 tons per year" means.

**Response to Comment 20:**

Although there are no specific limits for PM10 for this source or any specific limits for the wastewater treatment operations, these values are included in the Limited Potential to Emit table simply to show the total emissions with all limits considered. In order to calculate these total emissions, unlimited potential emissions must also be included for equipment that is not being limited. These emissions are important so

that this table can be used for PSD determinations for any future modifications that may occur at the facility. Since there are no specific limits for the wastewater treatment operations (constructed pre-1950), emissions from these operations are shown in this table to simply be below the applicable PSD significance levels for each pollutant.

Upon further review, IDEM, OAQ made the following changes to the permit. The Table of Contents was updated as needed.

1. This Part 70 Operating Permit includes applicable requirements that did not exist in previous permits for this source. Therefore following paragraph is added to the cover page of the Part 70 Operating permit:

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

#### **Section D**

1. Since incinerators I5 and I6 and incinerators I7 and I8 share a common control and then exit through a common stack, it will be impossible to test for individual emission rates from I5, I6, I7, and I8. Therefore limits need to be for I5/I6 combined and I7/I8 combined. Also, because testing can only verify short term limitations, emission factor limits are necessary in order to ensure that testing can in fact demonstrate compliance with the applicable limitation. Therefore the following changes were made to the permit.

#### **D.1.79 Testing Requirements [326 IAC 2-7-6(1)(6)]**

**(d) When testing to determine compliance with Condition D.1.1, the following apply:**

- (1) Based on the throughput limit in Condition D.1.1(b), the 72.5 tons per year particulate matter emission limitation in Condition D.1.1(a) for incinerators I1, I2, I3, and I4 combined is equivalent to a particulate matter emission limit of 2.3 pounds per ton of sludge processed.**
- (2) The 17.9 tons per year particulate matter emission limitation in Condition D.1.1(a) for incinerators I5, I6, I7, and I8 individually is equivalent to a particulate matter emission limit of 35.8 tons per year for each pair of incinerators (i.e. I5/I6 and I7/I8). Based on the throughput limit in Condition D.1.1(b), this limitation is equivalent to a particulate matter emission limitation of 1.2 pounds per ton of sludge processed.**
- (3) The particulate matter emission limitation in Condition D.1.1(b) is equivalent to an emission limitation of 1.3 pounds of particulate matter per ton of sludge processed.**

**(e) When testing to determine compliance with Condition D.1.3 for I5/I6 and I7/I8, the following apply:**

- (1) The sulfur dioxide emission limitation of 2.0 pounds per dry ton of sludge burned for each individual incinerator, I1-I8, is equivalent to a limit of 4**

**pounds of sulfur dioxide per dry ton of sludge processed for the pairs of incinerators (I5/I6 and I7/I8).**

- (2) The sulfur dioxide emission limitation of 14.19 pounds per hour for each individual incinerator, I1-I8, is equivalent to a limit of 28.38 pounds of sulfur dioxide per hour for the pairs of incinerators (I5/I6 and I7/I8).**

2. Paragraph (b) of Condition D.1.15(b) has been revised to clarify the record keeping requirements for the parametric monitoring:

D.1.15 Record Keeping Requirements

(b) To document compliance with Conditions D.1.1, ~~and~~ D.1.2, **and D.1.12**, the Permittee shall maintain records of the following:

- (1) The results of all performance tests for PM and SO<sub>2</sub> for each incinerator, I1-I8.
- (2) All readings of the following operational parameters of each scrubber used in conjunction with the incinerators, I1-I8, **once per shift** during normal operation when venting to the atmosphere:
- (A) ~~Inlet and outlet~~ Differential static pressure of each scrubber; and
- (B) Water flow rate of each scrubber.

3. Paragraph (b) of Condition D.2.6 has been revised to clarify that the the emission units referenced are boilers not heaters.

D.2.6 Sulfur Dioxide Emissions and Sulfur Content

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 12.6 MMBtu per hour ~~heater~~ **boilers**, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

4. Paragraph (a)(3) of Condition D.2.8 has been revised because the requirement that the natural gas boiler certification be signed by the responsible official is already stated in Condition D.2.9. Language has been added that records of natural gas usage shall be kept to certify compliance when burning natural gas.

D.2.8 Record Keeping Requirements

(3) ~~A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34); and~~ **To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.**

5. The first sentence of the Quarterly Deviation and Compliance Monitoring Report is being removed, because it poses a conflict with the provisions that require an annual certification. IDEM was not intending to turn this quarterly report into a compliance certification.

~~This report is an affirmation that the source has met all the requirements stated in this permit.~~ This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".

## Section B

1. In order to avoid confusion for renewals as to what "original" date we are referring to the following change has been made:

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the ~~original~~ **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.

2. Since B.7 (c) Duty to Supplement and Provide Information already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services (Indianapolis OES)  
Administration Building  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, and the Indianapolis OES 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and the Indianapolis OES copies of records required to

be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~

- (c) **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.

3. B.11 Preventive Maintenance Plan has been revised because it is not necessary to state twice that the PMP does not need to be certified. Since it is more appropriate to state in (c), it has been removed from (a).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

~~The PMP and the PMP extension notification does~~ not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (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 contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.

4. The requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from B.15 to B.12(h). B.12(e) Emergency Provisions has been revised to correct the rule cite as follows:

B.12 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(409) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

5. B.13(g) Permit Shield has been revised to correct the rule cite as follows:

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (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)(7)(8)]

6. Paragraph (c) has been removed from B.15 (Deviations from Permit Requirements and Conditions), then revised and incorporated in B.12 Emergency Provisions.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management

Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

~~(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

7. In order to be consistent with language in 326 IAC 2-7-12(b)(2), the "(D)(i)" of rule listed in (b) of Permit Revisions Under Economic Incentives and Other Programs condition has been removed.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(~~D~~)~~(i)~~ 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.

8. In order to be consistent with 326 IAC 2-7-20(a)(4) the rule cite in B.20(a)(5) has been revised as follows:

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and the Indianapolis OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

9. 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-7; therefore, this rule cite is being added to B.24. Also, the section and phone number of who the Permittee can contact has been corrected in (c).

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][**326 IAC 2-1.1-7**]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~ **4230**(ask for OAQ, ~~Technical Support and Modeling Section~~ **I/M & Billing Section**), to determine the appropriate permit fee.

## Section C

7. The following was added to C.9 Compliance Requirements to state what OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements:

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

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

8. C.7(e) Asbestos Abatement Projects has been revised to correct the rule cite.  
(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-~~41~~, 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.
3. In a discussion with Department of Public Works on October 30, 2003, IDEM re-evaluated the applicability of condition C.11. The sludge feed to the incinerator is measured based on the use of pumps used to feed the material to the incinerator. In case of breakdown of the pump no sludge can be fed to the incinerator and therefore no monitoring would be required. Therefore condition C.11 is deleted as follows (subsequent conditions in section C are renumbered):

### ~~C.11 Maintenance of Sludge Feed Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

- ~~(a) In the event that a breakdown of the sewage sludge feed rate monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.~~
- ~~(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

4. Item (b) in Condition C.13 (previously listed as Condition C.15) was deleted because an ERP has already been submitted by the Permittee.

### C.1513 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- ~~(b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~
- (eb) 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]

### **Significant Source Modification 097-16971-00032**

On October 15, 2003, IDEM, OAQ issued an approval to City of Indianapolis Belmont Advanced Wastewater Treatment Facility for the rehabilitation of the No. 2 multiple hearth municipal sewage sludge incinerator. This approval was a Significant Source Modification and was identified as 097-16971-00032. The applicable conditions in Significant Source Modification 097-16971-00032 are either incorporated in this approval or are superceded by this approval.

The applicable conditions for the No.2 multiple hearth municipal sewage sludge incinerator are incorporated in this Part 70 Operating Permit. The applicable construction conditions are incorporated in Section D.1. Once the construction is completed, the Permittee may request the department to modify the Part 70 operating permit to delete these conditions. Alternatively, the department may delete these conditions from the Part 70 operating permit at the time of renewal if it is made aware that the construction has been completed prior to renewal. The following new conditions are added after condition D.1.16 of the permit as applicable construction conditions.

**General Construction Condition for rehabilitation of the Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I2, with a maximum sludge burning capacity of 2.6 dry tons/hr.**

#### **D.1.17 Effective Date of the Permit [IC13-15-5-3]**

Pursuant to the Significant Source Modification 097-16971-00032 and IC 13-15-5-3, the Significant Source Modification 097-16971-00032 the approval for rehabilitation becomes effective upon its issuance.

#### **D.1.18 Revocation of Permits [326 IAC 2-1.1-9(5)] [326 IAC 2-7-10.5(i)]**

Pursuant to Significant Source Modification 097-16971-00032 and 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval for rehabilitation 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.

#### **D.1.19 Significant Source Modification [326 IAC 2-7-10.5(h)]**

Pursuant to Significant Source Modification 097-16971-00032 the following are applicable to this approval for rehabilitation of I2 incinerator.

- (a) The affidavit of construction attached to 097-16971-00032 shall be submitted to the Office of Air Quality (OAQ), Permits Branch. If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions

**associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.**

- (b) The Permittee will receive an Operation Permit Validation Letter from the Permits Branch authorizing the operation of all or part of each emissions unit covered by the affirmation in the affidavit of construction. The letter shall be attached to this source modification approval.**
- (c) Prior to receiving an Operation Permit Validation Letter, the Permittee may begin operating in accordance with the conditions in this approval the emissions units covered in this Significant Source Modification approval on the date the affidavit of construction is postmarked or hand delivered to IDEM if the emissions units were constructed as proposed in the application.**
- (d) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.**

In order to incorporate the operation conditions from Significant Source Modification 097-16971-00032, issued on October 15, 2003, the operation conditions in Section D.1 are revised as shown below. The changes to conditions in section D.1 discussed in previous pages of this document are shown in normal print. Changes due to incorporation of Significant Source Modification 097-16971-00032 are shown in **bold** and ~~strikeout~~ to represent language added and deleted respectively.

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

##### **D.1.1 Particulate Matter [326 IAC 6-1-12] [326 IAC 2-3]**

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- (a) Pursuant to 326 IAC 6-1-12 (Marion county particulate matter emission limitations), the total particulate matter emissions from incinerators I1, I2, I3, and I4 shall not exceed 72.5 tons per year and the emission rate shall not exceed 0.030 grains/dscf. The particulate matter emissions from each individual incinerator for I5, I6, I7, and I8 shall not exceed 17.9 tons per year and the emission rate shall not exceed 0.030 grains/dscf.**
- (b) Pursuant to Emission Offset Limits, 326 IAC 2-3, established by the Indianapolis OES in the City of Indianapolis operating permit which was issued on August 21, 1990, the total particulate matter emissions from all incinerators I1-I8 shall not exceed 40.3 tons per year and the total amount of sewage sludge incinerated by all incinerators, I1-I8, shall not exceed 62,050 dry tons of sludge per any 12-month period.**

##### **D.1.2 PSD Minor Limit [326 IAC 2-2]**

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**Pursuant to Significant Source Modification 097-16971-00032, issued on October 15, 2003, the I2 incinerator after completion of rehabilitation shall comply with the following:**

- (a) The amount of dry sludge delivered to the No. 2 incinerator shall be limited to less than 17,712 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (b) Emissions of CO from the No. 2 incinerator shall not exceed 51.78 pounds per ton of dry sludge burned.**

**Compliance with these limits make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, by limiting the CO emissions from the No. 2 incinerator to less than 458.58 tons per year. The source may petition to have the limits in (a) and (b) above modified based on the results of the stack testing required under Condition D.1.2, provided that the resulting allowable CO emissions are less than 458.58 tons per year, and the emissions of any other criteria pollutant are not increased above the PSD significant threshold listed in 326 IAC 2-2-1(jj)(1).**

**D.1.23 Sulfur Dioxide [326 IAC 7-4-2]**

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Pursuant to 326 IAC 7-4-2 (Marion county sulfur dioxide emission limitations), the sulfur dioxide emissions from each of the incinerators I1- I8 must not exceed 2.0 lb of SO<sub>2</sub> per dry ton of sludge burned and 14.19 pounds per hour.

**D.1.34 General Provisions Relating to HAPs [326 IAC 14-1-1] [40 CFR Part 61, Subpart A]**

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The provisions of 40 CFR Part 61, Subpart A-General Provisions, which are incorporated by reference as 326 IAC 14-1-1, apply to the facilities (incinerators I1 - I8) described in this section except when otherwise specified in 40 CFR Part 61, Subpart C or 40 CFR Part 61, Subpart E.

**D.1.45 Beryllium [40 CFR Part 61, Subpart C]**

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Pursuant to 40 CFR Part 61, Subpart C, the total emissions of beryllium from all incinerators I1-I8 shall not exceed a total of 10 grams per 24-hour period.

**D.1.56 Mercury [40 CFR Part 61, Subpart E]**

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Pursuant to 40 CFR Part 61, Subpart E, the total emissions of mercury from all incinerators I1-I8 shall not exceed a total of 3200 grams per 24-hour period.

**D.1.67 Regulation Non-applicability [326 IAC 12][40 CFR 60]**

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- (a) Incinerators I1, I2, I3, and I4 are not subject to the requirements of 40 CFR 60, Subpart O (Standards of Performance for Sewage Treatment Plants) because the incinerators were constructed prior to June 11, 1973, the applicability date of this rule.
- (b) Incinerators I1, I2, I3, and I4 are not subject to the requirements of 40 CFR 60, Subpart E (Standards of Performance for Incinerators) because the incinerators were constructed prior to August 17, 1971, the applicability date of this rule.

**D.1.78 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.89 Testing Requirements [326 IAC 2-7-6(1)(6)] [326 IAC 2-1.1-11]**

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- (a) Testing Requirements for I1, I2, I3, and I4: During the period between 6 and 12 months after issuance of this Part 70 permit, the Permittee shall perform the following tests in accordance with 326 IAC 3-6:

- (1) PM testing; Each incinerator shall be tested using a method approved by the Commissioner.
- (2) SO<sub>2</sub> testing; Each incinerator shall be tested using a method approved by the Commissioner.
- (3) Beryllium testing; Each incinerator shall be tested using a method approved by the Commissioner.
- (4) Mercury testing; Each incinerator shall be tested using a method approved by the Commissioner.

During the first permit term, these tests shall be repeated once every year from the date of this valid compliance demonstration. After the first permit term, these tests shall be repeated once every 2.5 years from the date of this valid compliance demonstration.

- (b) Testing Requirements for I5/I6 and I7/I8: If the operations at I5/I6 or I7/I8 are restarted, the Permittee shall perform the following tests in accordance with 326 IAC 3-6 within 60 days of commencement of operation, but no later than 180 days after start-up:
- (1) PM testing; Using methods approved by the Commissioner.
  - (2) SO<sub>2</sub> testing; Using methods approved by the Commissioner.
  - (3) Beryllium testing; Using methods approved by the Commissioner.
  - (4) Mercury testing; Using methods approved by the Commissioner.

If the operations at I5/I6 or I7/I8 are restarted, these tests shall be repeated once every year from the date of last valid compliance test during the permit term. For any year that the units I5/I6 or I7/I8 are not in operation for the entire year, the Permittee can delay the repeat testing until the subsequent anniversary of last valid compliance test.

- (c) In addition to these requirements, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance shall be determined by a performance test in accordance with Section C - Performance Testing.
- (d) When testing to determine compliance with Condition D.1.1, the following apply:
- (1) Based on the throughput limit in Condition D.1.1(b), the 72.5 tons per year particulate matter emission limitation in Condition D.1.1(a) for incinerators I1, I2, I3, and I4 combined is equivalent to a particulate matter emission limit of 2.3 pounds per ton of sludge processed.
  - (2) The 17.9 tons per year particulate matter emission limitation in Condition D.1.1(a) for incinerators I5, I6, I7, and I8 individually is equivalent to a particulate matter emission limit of 35.8 tons per year for each pair of incinerators (i.e. I5/I6 and I7/I8). Based on the throughput limit in Condition D.1.1(b), this limitation is

equivalent to a particulate matter emission limitation of 1.2 pounds per ton of sludge processed.

- (3) The particulate matter emission limitation in Condition D.1.1(b) is equivalent to an emission limitation of 1.3 pounds of particulate matter per ton of sludge processed.
- (e) When testing to determine compliance with Condition D.1.23 for I5/I6 and I7/I8, the following apply:
  - (1) The sulfur dioxide emission limitation of 2.0 pounds per dry ton of sludge burned for each individual incinerator, I1-I8, is equivalent to a limit of 4 pounds of sulfur dioxide per dry ton of sludge processed for the pairs of incinerators (I5/I6 and I7/I8).
  - (2) The sulfur dioxide emission limitation of 14.19 pounds per hour for each individual incinerator, I1-I8, is equivalent to a limit of 28.38 pounds of sulfur dioxide per hour for the pairs of incinerators (I5/I6 and I7/I8).

#### **D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

**Pursuant to Significant Source Modification 097-16971-00032, issued on October 15, 2003, within 60 days after achieving maximum production rate, but no later than 180 days after post-rehabilitation start-up, in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform CO testing for the No. 2 incinerator utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.**

#### **D.1.911 Particulate Matter (PM)**

Pursuant to the City of Indianapolis operating permit issued on August 21, 1990, and in order to comply with D.1.1, the venturi and tray type scrubbers for all incinerators I1-I8 shall be in operation at all times when the incinerators (I1-I8) are in operation.

### **Compliance Monitoring Requirements**

#### **D.1.102 Parametric Monitoring**

- (a) The Permittee shall record the total static pressure drop across the scrubber used in conjunction with each of the incinerators, I1-I8, at least once per shift when the incinerator(s) are in operation. When for any one reading, the pressure drop across each scrubber is less than the normal minimum of 20 inches of water for incinerators I1, I2, and I3, or 18 inches of water for incinerators I4, I5, I6, I7, and I8, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is below the mentioned minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall record the water flow rate through each scrubber used in conjunction with each of the incinerators, I1-I8, at least once per shift when the incinerator(s) are in operation. When for any one reading, the water flow rate through each scrubber is less than the normal minimum of 700 gallons per minute for incinerators I1, I2, I3, or 600 gallons per minute for incinerator I4, or 400 gallons per minute for incinerators I5, I6, I7, and I8 or minimum established during the latest stack test, the Permittee shall take reasonable

response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A water flow rate reading that is below the mentioned minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) The instruments used for determining the pressure and flow rates through the scrubber shall comply with Section C - Pressure Gauge and Other Instruments of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (d) Each sludge feed measuring device shall be calibrated, maintained, and operated on each working incinerator, I1-I8.
- (e) The instruments used for determining the sludge feed rates shall comply with Section C - Flow Rate Meter Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

#### D.1.143 Visible Emission Notations

- (a) Visible emission notations of the stack exhaust of each incinerator, stacks 01 - 07 shall be performed once per shift during normal daylight operations when the unit(s) are operating and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### D.1.124 Monitoring of Sewage Sludge Metal Content [40 CFR 61]

- (a) To demonstrate compliance with the Conditions in D.1.45 and D.1.56, the sewage sludge fed to the incinerators must be sampled and analyzed quarterly for beryllium and mercury content, the maximum daily sewage sludge feed rate to all incinerators, I1-I8, must be determined, and calculations shall be performed to show that the requirements in 40 CFR Part 61, Subparts C and E are being met.
  - (1) The sludge shall be sampled for mercury according to Method 105-Determination of Mercury in Wastewater Treatment Plant Sewage Sludges and for beryllium according to a method approved by the Commissioner. A total of three composite

samples shall be obtained within an operating period of 24 hours. When the 24-hour operating period is not continuous, the total sampling period shall not exceed 72 hours after the first grab sample is obtained. Samples shall not be exposed to any condition that may result in beryllium or mercury contamination or loss.

- (2) The maximum 24-hour period sludge incineration rate shall be determined by use of a flow measurement device that can measure the mass rate of sludge charged to the incinerator with an accuracy of +/- 5% over its operating range.
  - (3) The sampling, handling, preparation and analysis of sludge samples shall be accomplished according to Method 105 (40 CFR Part 61 Appendix B) for mercury and according to a method approved by the Commissioner for beryllium.
- (b) Pursuant to 40 CFR 61, Subpart E, the mercury emissions shall be determined by use of the following equation:

$$E = C Q F_{sm(avg)} / 1000$$

Where: E = Emissions of metal, grams/day  
C = Concentration of metal in sludge on a dry solids basis, micrograms/gram  
Q = Sludge charging rate, kg/day  
F<sub>sm</sub> = Weight fraction of solids in the collected sludge after mixing  
1000 = Conversion factor

## Record Keeping and Reporting Requirements

### D.1.135 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records of the results of all rolling monthly 12-month totals of the total dry tons of sewage sludge incinerated in all incinerators, I1-I8.
- (b) To document compliance with Conditions D.1.1, D.1.23, and D.1.102, the Permittee shall maintain records of the following:
  - (1) The results of all performance tests for PM and SO<sub>2</sub> for each incinerator, I1-I8.
  - (2) All readings of the following operational parameters of each scrubber used in conjunction with the incinerators, I1-I8, once per shift during normal operation when venting to the atmosphere:
    - (A) Differential static pressure of each scrubber; and
    - (B) Water flow rate of each scrubber.
- (c) To document compliance D.1.143, the Permittee shall maintain records of all visible emissions notations for each incinerator stack exhaust taken once per shift for all incinerators when in operation.
- (d) To document compliance with Conditions D.1.45, the Permittee shall maintain records of all quarterly sludge analysis for beryllium content, daily sewage sludge feed rate, and

supporting emission calculations that indicate the requirements of 40 CFR Part 61, Subpart C for beryllium are being met.

- (e) To document compliance with Conditions D.1.56, the Permittee shall maintain records of all quarterly sludge analysis for mercury content, daily sewage sludge feed rate, and supporting emission calculations that indicate the requirements of 40 CFR Part 61, Subpart E for mercury are being met.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.146 Reporting Requirements

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- (a) A quarterly summary of the information to document compliance with Conditions D.1.1 - D.1.56 shall be submitted to the addresses listed in D.1.146(c) of this section, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the three (3) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). In this summary, the Permittee shall provide the following information:
  - (1) A certification that the beryllium emissions are within the 40 CFR Part 61, Subpart C standard.
  - (2) A certification that the mercury emissions are within the 40 CFR Part 61, Subpart E standard.
  - (3) A summary of all rolling monthly calculations of the 12-month totals of dry tons of sewage sludge incinerated in all incinerators, I1-I8.
  - (4) A certification that all scrubbers used in conjunction with the incinerators, I1-I8, were operated within the appropriate parameter ranges and a summary of the events in which any of the scrubbers were operating outside the appropriate parameter ranges.
  - (5) The results of the quarterly sludge analysis tests for beryllium and mercury.
- (b) The Permittee shall submit the results of the annual stack tests for particulate matter sulfur dioxide, beryllium, and mercury within 30 days of receipt of the results.
- (c) The reports required in D.1.146(a) and (b) shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206

and

Indianapolis Office of Environmental Services  
Administration Building  
2700 South Belmont Avenue

Indianapolis, Indiana 46221

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

A new reporting form to show compliance with limit in condition D.1.2 is added to the permit as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 AND INDIANAPOLIS OFFICE OF ENVIRONMENTAL  
 SERVICES**

**Part 70 Source Modification Quarterly Report - I2**

Source Name: City of Indianapolis Belmont Advanced Wastewater Treatment Facility/  
 Indianapolis Sludge Incinerator  
 Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
 Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
 Source Modification No.: T097-5989-00032  
 Facility: No. 2 incinerator  
 Parameter: Amount of sludge delivered to the No. 2 incinerator  
 Limit: 17,712 tons per twelve (12) consecutive month period, with compliance  
 determined at the end of each month, equivalent to a CO emission limitation of  
 less than 458.58 tons per year

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Sludge burned (tons)	Sludge burned (tons)	Sludge burned (tons)
	This Month	Previous 11 Months	12 Month Total

- ? No deviation occurred in this month.
- ? Deviation/s occurred in this month.  
 Deviation has been reported on:

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

Source Name: Belmont Advanced Wastewater Treatment Plant  
Source Location: 2700 South Belmont Avenue, Indianapolis, IN 46221  
County: Marion  
SIC Code: 4952  
Operation Permit No.: T097-5989-00032  
Permit Reviewer: ERG/CPB

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Belmont Advanced Wastewater Treatment Plant relating to the operation of a municipal wastewater treatment plant, including sludge incinerators, for the city of Indianapolis.

#### Source Definition

This source consists of only one (1) plant. However, another source, Covanta Indianapolis, Inc., is on a contiguous property. Both of these sources are owned by the City of Indianapolis and have the same 2-digit SIC code. However, these sources do not forward any waste materials to each other and no employees or equipment are shared. The plants are operated by separate independent entities and are each major sources under the Part 70 definition. The IDEM proposes to issue separate Part 70 permits to these sources.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I1, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I1 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I1, exhausts to stacks No. 01 and No. 02.
- (b) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I2, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I2 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I2, exhausts to stacks No. 01 and No. 03.
- (c) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I3, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I3 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco

- venturi and tray impingement scrubber. Incinerator, I3, exhausts to stacks No. 01 and No. 04.
- (d) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1970, identified as I4, with a maximum sludge burning capacity of 2.6 dry tons/hr. Nine natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I4 with a capacity of 22.5 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Swemco venturi and tray impingement scrubber. Incinerator, I4, exhausts to stacks No. 01 and No. 05.
- (e) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I5, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I5 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide emissions are controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I5 and I6. Incinerator, I5, exhausts to stack No. 06 which is a common stack with I6.
- (f) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I6, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I6 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I6 and I5. Incinerator, I6, exhausts to stack No. 06 which is a common stack with I5.
- (g) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed in 1954, identified as I7, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I7 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I7 and I8. Incinerator, I7, exhausts to stack No. 7 which is a common stack with I8.
- (h) A Nichols multiple hearth wastewater treatment sludge incinerator, constructed 1954, identified as I8, with a maximum sludge burning capacity of 2.0 dry tons/hr. Six natural gas/No.2 fuel oil-fired auxiliary fuel burners also included as I8 with a capacity of 15 million BTU/hr total. Particulate and sulfur dioxide controlled by a Sly Mfg. tray and a Sly Mfg. venturi scrubber in series, which are common controls between I7 and I8. Incinerator, I8, exhausts to stack No. 07 which is a common stack with I7.

### **Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted facilities/units:

- (a) A Stone Johnston Corp. natural gas/No.2 fuel oil-fired boiler with serial number 843401, constructed in 1987, identified as B1, with a maximum heat input capacity of 12.6 million BTU/hr and exhausting to stack No. 08.
- (b) A Stone Johnston Corp. natural gas/No.2 fuel oil-fired boiler with serial number 843402, constructed in 1987, identified as B2, with a maximum heat input capacity of 12.6 million BTU/hr and exhausting to stack No. 09.
- (c) A Stone Johnston Corp. natural gas/No.2 fuel oil-fired boiler with serial number 843403, constructed in 1987, identified as B3, with a maximum heat input capacity of 12.6 million BTU/hr and exhausting to stack No. 10.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) 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.
- (e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (f) Vessels storing lubricating oils, hydraulic oils, and machining fluids.
- (g) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (j) Cleaners and solvents characterized as follows: (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.1 psi measured at 38 °C (100 °F) or; (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- (l) Closed loop heating and cooling systems.
- (m) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
- (n) Noncontact cooling tower systems with natural draft cooling towers not regulating under a NESHAP.
- (o) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (p) Paved and unpaved roads and parking lots with public access.

- (q) On-site fire and emergency response training approved by the department.
- (r) Emergency diesel generators not exceeding 1600 horsepower.
- (s) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (t) Unloading of septage from trucks.
- (u) Transport, loading, and unloading of incinerator ash (including quenching or ash).
- (v) Collection of recoverable waste oil.
- (w) Other categories with emissions below insignificant thresholds:
  - (1) A sludge ash monofill that was capped in 1999 but was previously used for the on-site disposal of ash (bottom ash and ash collected from the scrubbers) from the incineration of sewage sludge.
  - (2) Wastewater treatment operations which includes plant influent systems, headworks trash rake building, headworks raw sewage pump building, headworks bar screen building, headworks grit chambers, southport gate structure, primary treatment systems, grease and scum building, primary effluent diversion structure, pig retrieval structure, bio-roughing, nitrification system, effluent filter building and disinfection system, dissolved air flotation, gravity thickening, and dewatering operations.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) City of Indianapolis Operating Permit, issued on August 21, 1990.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) Emission limits for CO, VOC, and NO<sub>x</sub> applicable to the sewage sludge incinerators, I1-I8, pursuant to the City of Indianapolis Operating Permit, issued August 21, 1990, were not included in this permit because there are no applicable State or Federal regulations for these pollutants for this facility.
- (b) Emission limits for CO, VOC, and NO<sub>x</sub> applicable to the natural gas/No. 2 fuel oil-fired boilers, stacks No. 8, 9, and 10, pursuant to the City of Indianapolis Operating Permit, issued August 21, 1990, were not included in this permit because there are no applicable State or Federal regulations for these pollutants for this facility.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. Although these units are listed in the current City of Indianapolis Operating Permit, no construction permit, pursuant to 326 IAC 2-1-3, was obtained for this equipment. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 31, 1996.

**Emission Calculations**

Emissions of criteria pollutants are estimated based on the potential and actual emissions reported by the source in 1999. See Appendix A of this document for detailed HAP emissions calculations in Appendix A, page 1.

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	greater than 250
VOC	greater than 250
CO	greater than 250
NO <sub>x</sub>	greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Hydrogen Chloride	121.3
Lead	4.9
Acetonitrile	2.4
Acrylonitrile	2.4
Phenol	2.1
Cadmium	1.8
Chromium	1.4
Napthalene	0.9
Manganese	0.9
Nickel	0.8

HAP's	Potential To Emit (tons/year)
Toluene	0.7
Benzene	0.6
MEK	0.6
Vinyl Chloride	0.6
Arsenic	0.5
Mercury	0.2
Chlorobenzene	0.1
Total Xyleries	0.1
Antimony	0.1
Bis(2-ethylhexyl) phthalate	0.1
TOTAL	142.5

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10, SO<sub>2</sub>, VOC, CO, and NO<sub>x</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	7
SO <sub>2</sub>	4
VOC	77
CO	1392
NO <sub>x</sub>	153
HAP (specify)	Not reported

**Limited Potential to Emit**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Four sewage sludge incinerators I1 - I4 (pre-1977)	Combined PM emissions from I1 -I8	Combine d PM emission s from I1- I8	62.15 ton/yr total or 2 lb/dry ton of sludge				<10 grams of Be per 24 hour period

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Four sewage sludge incinerators, I5-I8 (pre-1977)	?40.13 ton/yr	?40.3 ton/yr	62.15 ton/yr total or 2 lb/dry ton of sludge	>250	>250	>250	<3200 grams of Hg per 24 hour period for I1-I8 combined
Three natural gas/No. 2 oil-fired and boilers (constr. 1987) <sup>1</sup>	0.15 lb/MMBtu when combusting No. 2 fuel oil  0.01 grains per dscf when combusting natural gas	0.15 lb/MMBtu when combusting No. 2 fuel oil  0.01 grains per dscf when combusting natural gas	<40	---	---	---	---
Wastewater treatment operations (pre-1950)	<40	<40	<40	<40	<100	<40	<25

<sup>1</sup> This permit limits the total amount of No. 2 fuel oil that can be combusted in any 12-month period such that the potential emissions of sulfur dioxide are below the PSD significance threshold.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as maintenance attainment for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for CO, PM<sub>10</sub>, NO<sub>2</sub>, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Federal Rule Applicability**

- (a) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR 60.150 through 60.156, Subpart O - Standard of Performance for Sewage Treatment Plants), because the date of construction of the sewage sludge incinerators is prior to June 11, 1973, the applicability date for the NSPS.
- (b) This source is not subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Publicly Owned Treatment Works, 326 IAC 14 (40 CFR 63.1580 through 63.1595, Subpart VVV) because the affected facility is not a major source of HAP emissions. This rule applies only to publicly owned treatment works. While the entire Belmont source is a major source of HAP, the POTW facility is not.
- (c) This source is not subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Vinyl Chloride, 326 IAC 14 (40 CFR 61.60 through 61.71, Subpart F) because this source is not a vinyl chloride production facility, as defined by the subpart.
- (d) The sewage sludge incinerators, I1 - I8, are not subject to the requirements of the New Source Performance Standard (NSPS) for Incinerators, 326 IAC 12 (40 CFR 60.50 through 60.54, Subpart E) because the date of construction is prior to August 17, 1971 the applicability date of the NSPS.
- (e) The three boilers are not subject to the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR 60.40c through 60.48c, Subpart Dc - Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units) because the date of construction is prior to June 9, 1989, the applicability date of the NSPS.
- (f) The sewage sludge incinerators, I1-I8, are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 61.30, Subpart C - National Emission Standard for Beryllium).

The provisions of 40 CFR 61 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 61 Subpart C.

Pursuant to 40 CFR 61, Subpart C, the sewage sludge incinerators are subject to the following conditions:

- (1) The emissions to the atmosphere from all incinerators, I1-I8, shall not exceed 10 grams of beryllium over a 24-hour period. The source has chosen not to request the alternative ambient concentration limit provided in 40 CFR 61.32(b).
- (2) Each incinerator will be tested for beryllium emissions to demonstrate compliance with this NESHAP and to relate the stack emissions to the beryllium content in

the sludge feed. The source will perform sludge analysis quarterly to demonstrate that the incinerators are in compliance with the NESHAP.

- (3) A summary report of the sludge analysis and emissions calculations shall be prepared to document the ongoing compliance status of the sewage sludge incinerators. This report shall be completed quarterly and shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206

and

Indianapolis Environmental Resources Management Division  
Administration Building  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

- (4) The sewage sludge incinerators shall be subject to the record keeping and reporting requirement as indicated in the Beryllium NESHAP.

- (g) The sewage sludge incinerators, I1-I8, are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 61.50, Subpart E - National Emission Standard for Mercury).

The provisions of 40 CFR 61 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 61 Subpart E.

Pursuant to 40 CFR 61, Subpart E, the sewage sludge incinerators are subject to the following conditions:

- (1) The emissions to the atmosphere from all incinerators, I1-I8, shall not exceed 3200 grams of mercury over a 24-hour period.
- (2) Each incinerator will be tested for mercury emissions to demonstrate compliance with this NESHAP and to relate the stack emissions to the content of mercury in the sludge feed. The source will perform sludge analysis quarterly to demonstrate that the incinerators are in compliance with the NESHAP.
- (3) A summary report of the sludge analysis and emissions calculations shall be prepared to document the ongoing compliance status of the sewage sludge incinerators. This report shall be completed quarterly and shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206

and

Indianapolis Environmental Resources Management Division  
Administration Building  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

- (4) The sewage sludge incinerators shall be subject to the record keeping and reporting requirement as indicated in the Mercury NESHAP.

#### **State Rule Applicability - Entire Source**

##### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on May 31, 1996.

##### 326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP).

##### 326 IAC 2-2 (Preventive Significant Deterioration (PSD))

Although this source is a major PSD source, at the time of initial construction of the source, PSD rules did not exist. Therefore, a PSD analysis was not required. The only modification to the source since initial construction was the construction of the three natural gas/No. 2 fuel oil boilers in 1987. In order to ensure that IAC 326 2-2 is not applicable to this modification, the source must limit the usage of No. 2 fuel oil to less than or equal to 1,060,000 gallons per year for any 12-month period (see Appendix A for calculations). This will limit emissions of sulfur dioxide to less than the 40 tons per year significance threshold. This source has never gone through a Prevention of Significant Deterioration (PSD) review for a modification.

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

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of CO, NO<sub>x</sub>, PM, PM-10, SO<sub>2</sub>, and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

##### 326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 6-1-12 (Marion county particulate matter emission limitations)**

Pursuant to 326 IAC 6-1-12 (Marion county particulate matter emission limitations), the total particulate matter emissions from the sewage sludge incinerators, I1, I2, I3, and I4, must not exceed 72.5 tons per year or 0.030 grains/dscf and the emissions from each individual sewage sludge incinerator, I5, I6, I7, and I8, must not exceed 17.9 tons per year or 0.030 grains/dscf. 326 IAC 6-1-12 does not apply to the three boilers because these units are not specifically listed in this rule.

#### **326 IAC 2-3 (Emission Offsets)**

Pursuant to Emission Offset Limits established by the Indianapolis Environmental Resources Management Division in the City of Indianapolis operating permit which was issued on August 21, 1990, the total particulate matter emissions from all incinerators I1-I8 must not exceed 40.3 tons per year and the total amount of sewage sludge incinerated by all incinerators, I1-I8, shall not exceed 62,050 dry tons of sludge per any 12-month period.

These emission offset limits were established on March 11, 1986 to provide an emission offset for the construction of a trash incinerator at another site owned by the City of Indianapolis because Marion County was non-attainment for particulate matter at the time. No modifications were actually made at the source.

#### **326 IAC 6-1-2(b) (Particulate Emission Limitations for Fuel Combustion Steam Generators)**

Pursuant to 326 IAC 6-1-2(b), (Particulate Emission Limitations for Fuel Combustion Steam Generators), the particulate matter emissions from each of the three (3) 12.6 MMBtu/hour natural gas/No. 2 fuel oil boilers shall be limited as follows:

- (a) Particulate matter emissions from each boiler shall not exceed 0.15 pounds per million British thermal units heat input when combusting No. 2 fuel oil; and
- (b) Particulate matter emissions from each boiler shall not exceed 0.01 grains per dry standard cubic foot when combusting natural gas.

This source is not subject to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because 326 IAC 6-1-2(b) applies.

#### **326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)**

Pursuant to 326 IAC 7-1.1-1 (Sulfur dioxide emissions limitations), the Sulfur dioxide emissions from each of the three (3) 12.6 MMBtu per hour natural gas/No. 2 fuel oil-fired boilers shall not exceed five tenths (0.5) pounds per MMBtu heat input when combusting No. 2 fuel oil. Using the AP-42 emission factor for sulfur dioxide from Appendix A along with the standard heating values for No. 2 fuel oil, the calculated emission rate for these boilers when burning No. 2 fuel oil is 0.5 pounds per MMBtu heat input. Therefore, these boilers are assumed to be in compliance with this condition.

#### **326 IAC 2-2 (Preventive Significant Deterioration (PSD))**

The sulfur dioxide emissions from the three natural gas/No. 2 fuel oil-fired boilers will be limited to less than 40 tons per year which will render 326 IAC 2-2 (PSD Rules) not applicable. The source will be in compliance with this limitation by limiting the total amount of No. 2 fuel oil burned in all three boilers during any 12-month period to less than or equal to 1,060,000 gallons and by limiting

the sulfur content of the fuel oil burned to less than or equal to 0.5% sulfur by weight. See Appendix A of this document for the boiler emissions calculations.

Carbon monoxide, PM, PM<sub>10</sub>, and NO<sub>x</sub> are all less than the significance levels for PSD without being limited. Therefore, only sulfur dioxide is limited.

#### 326 IAC 7-4-2 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-4-2 (Marion county sulfur dioxide emission limitations), the sulfur dioxide emissions from each of the incinerators, I1- I8, must not exceed 2 lb of SO<sub>2</sub> per dry ton of sludge burned or 14.19 pounds per hour. Based on AP-42 emission factors and actual reported SO<sub>2</sub> emissions for this source, I1-I8, are in compliance with these requirements.

#### 326 IAC 9 (Carbon Monoxide Emission Limitations)

This source is not subject to 326 IAC 9 (Carbon Monoxide Emission Limitations) because this source commenced operation prior to the applicability date listed in the rule.

### **State Rule Applicability - Insignificant Activities**

#### 326 IAC 6-1-2(a) (Particulate Emission Limitations for General Sources)

The particulate matter (PM) from the brazing, cutting, soldering, and welding equipment shall be limited to 0.03 gr/dscf:

#### 326 IAC 8-3-2 and 8-3-5 (Volatile Organic Compounds (VOC) from Degreasing Operations)

The degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 are subject to 326 IAC 8-3-2 and 326 IAC 8-3-5. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-5(a) the owner or operator of a cold cleaner degreaser facility shall ensure that the degreaser is equipped with a cover that must be designed so that it can be easily operated with one (1) hand if certain conditions exist. The degreaser must be equipped with a facility for draining cleaned articles and have a permanent label listing operating requirements. The solvent spray must be a solid continuous stream applied at an appropriate pressure. The degreaser must be equipped with a control device if the solvent volatility is at a certain level. The owner or operator must ensure that the cover is closed whenever the degreaser is not in use, that articles are adequately drained, and waste solvent is stored appropriately.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement

for a more or less 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 requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

1. The Belmont AWTP has applicable compliance monitoring conditions as specified below:
  - (a) The Permittee shall record the total static pressure drop across the scrubber used in conjunction with each of the incinerators, I1-I8, at least once per shift when the incinerator(s) are in operation. When for any one reading, the pressure drop across each scrubber is outside the normal range of 38 to 42 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (b) The Permittee shall record the water flow rate through each scrubber used in conjunction with each of the incinerators, I1-I8, at least once per shift when the incinerator(s) are in operation. When for any one reading, the water flow rate through each scrubber is outside the normal range of 38 to 50 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A water flow rate reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (c) The Permittee shall maintain records of the following monthly total amount of dry sewage sludge incinerated by all incinerators, I1-I8, in a 12-month period, to demonstrate that the total amount incinerated does not exceed 62,050 dry tons per 12-month period.
  - (d) Visible emissions notations of the stack exhaust of each incinerator, stacks 01-07, shall be performed once per shift during normal daylight operations when the unit(s) are operating and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or continuous operations, readings shall be taken during that part of the operation that would normally be expected to

cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (e) The Permittee shall sample and analyze the sewage sludge fed to the incinerators quarterly for beryllium and mercury content according to Method 105 (40 CFR 61, Appendix B) or other methods as approved by the Commissioner, and perform associated emission calculations to demonstrate that daily emissions of beryllium and mercury are below the levels of 40 CFR Part 61, Subparts C and E.

These monitoring conditions are necessary because the scrubber for each incinerator, I1-I8, must operate properly to ensure compliance with 326 IAC 6-1-12 and 326 IAC 2-7 (Particulate Matter Emissions), 326 IAC 7-4-2 (Sulfur Dioxide Emissions), and 326 IAC 2-7 (Part 70) and because the total amount of sludge incinerated annually must be recorded to ensure compliance with Emission Offset Limits established by the Indianapolis Environmental Resources Division in the City of Indianapolis operating permit which was issued on August 21, 1990. The sewage sludge metals content monitoring requirements are necessary to ensure compliance with the daily emission limits in 40 CFR Part 61, Subpart C (Beryllium NESHAP) and 40 CFR Part 61, Subpart E (Mercury NESHAP).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations in Appendix A, page 1.

### **Conclusion**

The operation of this municipal wastewater treatment plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T097-5989-00032.

**Appendix A: Emission Calculations**  
**Multiple Hearth Incinerators #1-8**

**Company Name:** Belmont Advanced Wastewater Treatment Plant  
**Address City IN :** 2700 South Belmont Avenue Indianapolis, IN 46221  
**Part 70 Permit:** 097-5989-00032  
**Pit ID:** 00032  
**Reviewer:** KM  
**Date:** 03/19/03

THROUGHPUT tons/hr 14.4	LIMITED THROUGHPUT ton/yr 62,050	<b>Total HAP PTE = 8.24</b>
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	POLLUTANT							
Emission Factor in lb/ton	PM 2.2	SO2 0.2	NOx 5	CO 31	VOC 1.7			
Potential Emissions in ton	68.3	6.2	155.1	961.8	52.7			
Emission Factor in lb/ton	Lead 6E-02	HCl 0.02	2,3,7,8 TCDD 4E-09	2,3,7,8 TCDF 9.20E-08	Total TCDF 1.20E-06	Total PCDF 3E-09	Total HxDCF 1.10E-07	Total HpCDF 8.20E-08
Potential Emissions in ton	1.862	0.621	1.24E-07	2.85E-06	3.72E-05	8.07E-08	3.41E-06	2.54E-06
Emission Factor in lb/ton	Total OCDF 1.30E-08	1,1,1 Trichloroethane 1.20E-03	1,1 Dichloroethane 4.60E-04	1,2 Dichloroethane 2E-05	1,4 Dichlorobenzene 4.80E-04	Acetaldehyde 3.20E-04	Acetonitrile 2.00E-02	Acrylonitrile 3.40E-02
Potential Emissions in ton	4.03E-07	0.037	0.014	0.001	0.015	0.00993	0.6205	1.05485
Emission Factor in lb/ton	Benzene 0.013	bis(2-ethylhexyl)phthalate 6.40E-04	Carbon Tetrachloride 6E-05	Chlorobenzene 1.20E-03	Chloroform 2.60E-03	Ethylbenzene 2.00E-03	Formaldehyde 2.60E-03	MEK 1.80E-02
Potential Emissions in ton	0.403	0.020	0.002	0.037	0.081	0.0621	0.0807	0.5585
Emission Factor in lb/ton	MIBK 2E-05	Methylene Chloride 1.80E-03	Napthalene 0.018	Perchloroethylene 3.60E-03	Phenol 3.60E-03	Tetrachlorethane 2.40E-02	Toluene 1.30E-02	Trans 1,2, Dichloroethene 1.00E-04
Potential Emissions in ton	0.001	0.056	0.558	0.112	0.112	0.7446	0.4033	0.0031
Emission Factor in lb/ton	Trichloroethene 9E-04	Vinyl Chloride 7.40E-03	Total Xylenes 0.0019	Antimony 4.80E-04	Arsenic 1.20E-03	Beryllium 1.00E-05	Cadmium 6.60E-03	Chromium 4.2E-03
Potential Emissions in ton	0.028	0.2296	0.059	0.0149	0.0372	0.0003	0.2048	0.1303
Emission Factor in lb/ton	Cobalt 9E-04	Manganese 1.70E-03	Mercury 1E-05	Nickel 0.0018	Phosphorus 0.0240	Selenium 0.0003		
Potential Emissions in ton	0.028	0.053	0.0003	0.0558	0.7446	0.0093		

**Methodology**

Emission factors are from AP 42 (5th Edition 1/95) Table 2.2-1-5, for multiple hearth sewage sludge incinerators with venturi and impingement scrubbers. Throughput is based on all incinerators #1-4 operating at full capacity 8760 hr/yr and incinerators #6 and #7 also operating at full capacity 8760 hr/yr. (Incinerators #5 and #6 cannot operate simultaneously and incinerators #7 and #8 cannot operate simultaneously). Limited Throughput (lb/hr) = total amount of sewage sludge incinerated by all incinerators pursuant to emission offset limit in operating permit issued by the city of Indianapolis on 8/21/90.

**Appendix A: Emission Calculations**  
**Multiple Hearth Incinerators #1-8**

**Company Name:** Belmont Advanced Wastewater Treatment Plant  
**Address City IN Zip:** 2700 South Belmont Avenue Indianapolis, IN 46221  
**Part 70 Permit:** 097-5989-00032  
**Plt ID:** 00032  
**Reviewer:** ERG/CPB  
**Date:** 09/29/2000

THROUGHPUT lbs/hr 22,160
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THROUGHPUT ton/yr 97,060
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<b>Total HAP PTE =</b>	<b>142.82</b>
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	POLLUTANT				
	Lead	HCl	1,4-Dichlorobenzene	Acetonitrile	Acrylonitrile
Emission Factor in lb/ton	0.1	2.5	0.00082	0.05	0.05
Potential Emissions in ton/yr	4.9	121.3	0.0	2.4	2.4
	Benzene	MEK	Naphthalene	Phenol	Toluene
Emission Factor in lb/ton	0.012	0.012	0.018	0.044	0.015
Potential Emissions in ton/yr	0.6	0.6	0.9	2.1	0.7
	Vinyl Chloride	Beryllium	Arsenic	Cadmium	Chromium
Emission Factor in lb/ton	0.013	0.0003	0.0094	0.037	0.029
Potential Emissions in ton/yr	0.6	0.015	0.5	1.8	1.4
	Manganese	Mercury	Nickel	Total PCDD	Total PCDF
Emission Factor in lb/ton	0.019	0.0046	0.016	5.40E-09	2.00E-06
Potential Emissions in ton/yr	0.9	0.2	0.8	2.62E-07	9.71E-05
	bis(2-ethylhexyl)phthalate	Carbon Tetrachloride	Chlorobenzene	Chloroform	Ethylbenzene
Emission Factor in lb/ton	0.0019	0.00002	0.0015	6.00E-05	0.0016
Potential Emissions in ton/yr	0.1	0.0010	0.1	0.0029	0.0776
	Methylene Chloride	Total Xylenes	Antimony	Cobalt	Selenium
Emission Factor in lb/ton	0.0008	0.0019	0.003	0.0018	0.0003
Potential Emissions in ton/yr	0.04	0.1	0.1	0.0874	0.0146

**Methodology**

Emission factors are from AP 42 (5th Edition 1/95) Table 2.2-1-5, Uncontrolled emission factors for multiple hearth sewage sludge incinerators

Throughput (lb/hr) \* 8760 hr/yr \* ton/2000 lb = throughput (ton/yr)

Throughput is based on all incinerators #1-4 operating at full capacity 8760 hr/yr and incinerators #6 and #7 also operating at full capacity 8760 hr/yr. (Incinerators #5 and #6 cannot operate simultaneously and incinerators #7 and #8 cannot operate simultaneously).

**Appendix A: Potential Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil**

**Company Name:** Belmont Advanced Wastewater Treatment Plant  
**Address, City IN Zip:** 2700 South Belmont Avenue, Indianapolis, IN 46221  
**Part 70 Permit:** 097-5989-00032  
**Pit ID:** 00032  
**Reviewer:** ERG/CPB  
**Date:** 08/20/2001

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur <input type="text" value="0.5"/>
<input type="text" value="37.8"/>	<b>2365.2</b>	

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	2.4	84.0	23.7	0.4	5.9

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Limited Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil**

**Company Name:** Belmont Advanced Wastewater Treatment Plant  
**Address, City IN Zip:** 2700 South Belmont Avenue, Indianapolis, IN 46221  
**Part 70 Permit:** 097-5989-00032  
**Pit ID:** 00032  
**Reviewer:** ERG/CPB  
**Date:** 08/20/2001

Heat Input Capacity MMBtu/hr	Limited Throughput kgals/year	S = Weight % Sulfur 0.5
37.8	1060 *****	

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	1.1	37.6	10.6	0.2	2.7

**Methodology**

\*\*\*\*\* This is the fuel oil usage limit that was added to the Belmont permit to limit SO2 PTE emissions below PSD thresholds.

\*\*\*\*\* The NG PTE emissions for the total capacity of the blrs (12.6\*3) is only 0.1 tpy - the source can use NG to supplement fuel oil use.

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).