

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Environmental Services of America - IN, Inc.  
604 S. Scott Street  
South Bend, Indiana 46601**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed 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 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F141-7448-00056	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and presented in the permit application.

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

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The Permittee owns and operates a bulk liquid waste and drum waste processing and fuel blending plant.

Responsible Official: Steven R. Kellogg  
Source Address: 604 S. Scott Street, South Bend, IN 46601  
Mailing Address: 604 S. Scott Street, South Bend, IN 46601  
SIC Code: 4953  
County Location: St. Joseph  
County Status: Nonattainment for Particulate Matter  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD

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

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

- (1) one (1) waste processing area (including one waste drum shredder), identified as Emission Unit ID (EU) 100, with a limited capacity of fifteen thousand (15,000), fifty-five (55) gallon drums per year, using a caustic wet scrubber as control, and exhausting to stack S/V ID 001, installed in 1990.
- (2) one (1) tank farm area, identified as EU 200, consisting of the following ten (10) tanks, with a maximum throughput for all tanks of 2,000,000 gallons per year, using carbon adsorbers as control, and exhausting to stack S/V ID 002, installed in 1986.
  - (a) two (2) 3,775 gallon capacity flat roof storage tanks identified as Tanks 1 and 2, exhausting at one emission point identified as S/V ID 002, and
  - (b) eight (8) 6,195 gallon capacity flat roof storage tanks identified as Tanks 3, 4, 5, 6, 7, 8, 9, and 10, exhausting at one emission point identified as S/V ID 002.
- (3) one (1) empty (shredded) drum processing area, identified as EU 400, with a maximum capacity of fifteen thousand (15,000), empty fifty-five (55) gallon drums per year, and exhausting as fugitive emissions identified as S/V ID 004.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (4) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (5) Stockpiled soils from soil remediation activities that are covered and waiting transport for

disposal.

- (6) Other activities or categories not previously identified. Including: Laboratory Hood Vents and Storage and Process Area Roof Vents.

A.4 FESOP Applicability [326 IAC 2-8-2]

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

With the exception of the RCRA Part B Permit IND 980 590 947, this permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

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

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

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

### **B.3 Permit Term [326 IAC 2-8-4(2)]**

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### **B.4 Enforceability [326 IAC 2-8-6]**

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

### **B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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

### **B.6 Severability [326 IAC 2-8-4(4)]**

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

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**

- (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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification 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 Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (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, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

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).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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 which will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission

limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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, OAM, 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
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 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form(s) or their substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

**B.17 Permit Renewal** [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).  
  
Request for renewal shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015
- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (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, OAM, on or before the date it is

due. [326 IAC 2-5-3]

- (2) If IDEM, OAM 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 until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal [326 IAC 2-8-9]**  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM 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, OAM, any additional information identified as needed to process the application.

**B.18 Administrative Permit Amendment [326 IAC 2-8-10]**

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- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]**

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- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b), except as provided by 326 IAC 2-8-11(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

**B.20 Significant Permit Modification [326 IAC 2-8-11(d)]**

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- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(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 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 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 Management  
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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) 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 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 2-8-15(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 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.24 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the

conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, 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.  
[326 IAC 2-8-5(a)(4)]

**B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]**

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Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

**B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) Emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) will not apply.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20).
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

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

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

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

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]  
[40 CFR 61, Subpart M]**

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Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

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

**C.8 Performance Testing [326 IAC 3-2.1]**

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(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days before the intended test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

### **C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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).

### **C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

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- (a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.
- (b) In the event that a breakdown of the 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.
- (c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.
- (d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.

### **C.11 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the requirements of this permit shall be performed, according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

### **C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]**

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- (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
  - (3) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered the notice 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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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 is federally enforceable.

**Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), 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
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

C.14 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that 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 an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test**

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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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

**C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements 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 annual statement must be submitted to:

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

Indianapolis, Indiana 46206-6015

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

C.17 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data 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 and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and

- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) 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 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (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 Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

### **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

- (1) one (1) waste processing area (including one waste drum shredder), identified as Emission Unit ID (EU) 100, with a limited capacity of fifteen thousand (15,000), fifty-five (55) gallon drums per year, using a caustic wet scrubber as control, and exhausting to stack S/V ID 001, installed in 1990.

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

#### D.1.1 Hazardous Air Pollutants (HAP)

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The amount of drums shredded and wastes processed shall be limited to ensure that the emissions of any single HAP from the source are limited to 0.78 tons per month, and that the emissions of any combination of HAPs from the source are limited to 2 tons per month. The following limitations apply to this facility:

- b) This facility shall limit hours of operation to 3,000 hours per twelve (12) month period, rolled on a monthly basis and on the emission rate of 4.75 pounds per hour of toluene and 12.31 pounds per hour of all HAPs. During the first 12 months of operation under this permit, the sum of the hours shall be limited such that the total hours divided by the accumulated months of operation shall not exceed 250 hours per month.
- c) This facility shall also limit drum shredding operations to 15,000 drums per twelve (12) month period, rolled on a monthly basis. During the first 12 months of operation under this permit, the sum of the drums shredded shall be limited such that the total drums shredded divided by the accumulated months of operation shall not exceed 1,250 drums per month.

These operating limits shall limit total volatile organic compound (VOC) emissions from the processing area to 13.53 tons per twelve (12) month period rolled on a monthly basis and total HAP emissions from the processing area to 18.47 tons per twelve (12) month period rolled on a monthly basis. Compliance with this limit makes 326 IAC 2-7 not applicable.

#### D.1.2 Emission Offset Minor Limit [326 IAC 2-3]

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This facility shall limit its hours of operation and amount of drums processed to ensure that emissions of VOC are limited to no more than 13.53 tons per twelve (12) month period rolled on a monthly basis and total HAP emissions are limited to no more than 18.47 tons per twelve (12) month period rolled on a monthly basis. Compliance with this limit in conjunction with the VOC limits required in Sections D.2.1 and D.3.1, makes 326 IAC 2-2 and 326 IAC 2-7 not applicable.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

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The Permittee shall test for HAP and VOC emissions from the exhaust stack in conformance with source operation condition number C.5. The Permittee shall perform HAP and VOC testing utilizing approved methods for the applicable pollutants, or other methods as approved by the Commissioner. The stack test shall be performed within 18 to 24 months after issuance of this permit and repeated at least once every (five) 5 years from the date of this valid compliance

demonstration.

#### D.1.5 Hazardous Air Pollutants (HAP)

Pursuant to St. Joseph County Health Department Permit No. I31 issued on March 18, 1996, the caustic scrubber for HAP/VOC control shall be in operation at all times when the drum shredder and waste processing (EU 100) is in operation.

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

#### D.1.6 Monitoring

- (a) Daily pH readings shall be made on the caustic scrubber while the drum shredder and waste processing is in operation.
- (b) Weekly NaOH concentration readings shall be made on the caustic scrubber while the drum shredder and waste processing is in operation.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.6, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be compiled monthly and shall be complete and sufficient to establish compliance with the HAP and VOC emission limits established in Condition D.1.1 and D.1.2.
  - (1) The amount of HAP and VOC content of the materials processed. Records shall include purchase orders, invoices, material safety data sheets (MSDS), and waste manifests necessary to verify the type and amount processed.;
  - (2) A log of the dates and hours of operation;
  - (3) The volume weighted HAP and VOC content of the materials processed each month;
- (b) To document compliance with this condition, the Permittee shall maintain a log of daily readings, weekly concentrations, hours of operation and amount (number of drums) processed.
- (c) The Permittee shall maintain a log of all additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1, D.1.2, and D.1.6 (as required by St. Joseph County Health Department Permit No. I31 issued on March 18, 1996), 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 quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

- (2) one (1) tank farm area, identified as EU 200, consisting of the following ten (10) tanks, with a maximum throughput for all tanks of 2,000,000 gallons per year, using carbon adsorbers as control, and exhausting to stack S/V ID 002, installed in 1986.
- (a) two (2) 3,775 gallon capacity flat roof storage tanks identified as Tanks 1 and 2, exhausting at one emission point identified as S/V ID 002, and
  - (b) eight (8) 6,195 gallon capacity flat roof storage tanks identified as Tanks 3, 4, 5, 6, 7, 8, 9, and 10, exhausting at one emission point identified as S/V ID 002.

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4(1)]

The sum of the throughputs of organic liquids through all storage tanks is limited to 2,000,000 gallons per twelve (12) month period, rolled on a monthly basis. During the first 12 months of operation under this permit, the sum of the throughputs shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed 166,666 gallons per month. This operating limit shall limit total volatile organic compound (VOC) emissions from all tanks to 0.06 tons per twelve (12) month period rolled on a monthly basis and total HAP emissions from all tanks to 0.07 tons per twelve (12) month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-2 and 326 IAC 2-7 do not apply.

### Compliance Determination Requirements

#### D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).

#### D.2.3 Volatile Organic Compounds (VOC)

Compliance with the usage limitations contained in Conditions D.2.1 shall be determined pursuant to 326 IAC 8-4-3(a). IDEM, OAM, reserves the authority to determine compliance using Method 18, 25, or 25A in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### D.2.4 Hazardous Air Pollutants (HAP)

The carbon adsorber for HAP/VOC control shall be in operation at all times when the storage tanks (EU 200) are in operation.

#### D.2.5 Monitoring

Daily saturation indicator readings shall be made on the carbon adsorber while any of the tanks are in operation. These readings shall provide the baseline for determining VOC breakthrough on the carbon adsorbers.

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

### **D.2.6 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1 and D.2.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC emission limits established in Condition D.2.1.
- (1) The throughput of organic liquids through each tank for each month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) and/or waste manifest necessary to verify the type and amount of gasoline throughputs;
  - (2) The total throughputs of organic liquids through all tanks per month;
  - (3) The 12 month rolling total throughputs of organic liquids through all tanks;
  - (4) the types of organic liquids stored;
  - (5) the maximum true vapor pressure of the organic liquids as stored; and
  - (6) the results of inspections performed in compliance with 326 IAC 8-4-3(c)(2)(B) & 8-4-3(d) on the storage vessels.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.7 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.2.1 and D.2.5 (as required by St. Joseph County Health Department Permit No. I31 issued on March 18, 1996), shall be submitted to the addresses 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 quarter being reported.

## SECTION D.3 FACILITY OPERATION CONDITIONS

- (3) one (1) empty (shredded) drum processing area, identified as EU 400, with a maximum capacity of fifteen thousand (15,000), empty fifty-five (55) gallon drums per year, and exhausting as fugitive emissions identified as S/V ID 004.

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

#### D.3.1 Hazardous Air Pollutants (HAP)

The amount of drums stored onsite shall be limited to ensure that the emissions of any single HAP from the source are limited to 0.78 tons per month, and that the emissions of any combination of HAPs from the source are limited to 2 tons per month. This facility shall limit drum storage to 15,000 drums per twelve (12) month period, rolled on a monthly basis. During the first 12 months of operation under this permit, the sum of the drums shredded shall be limited such that the total drums shredded divided by the accumulated months of operation shall not exceed 1,250 drums per month. These operating limits shall limit total volatile organic compound (VOC) emissions from storage area to 2.51 tons per twelve (12) month period rolled on a monthly basis and total HAP emissions from the storage area to 2.91 tons per twelve (12) month period rolled on a monthly basis. Compliance with this limit makes 326 IAC 2-2 and 326 IAC 2-7 not applicable.

### Compliance Determination Requirements

#### D.3.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).

#### D.3.3 Hazardous Air Pollutants (HAP)

Pursuant to RCRA Part B Permit IND 980 590 947, issued in March, 1993, the number of drums stored per year (EU 400) shall be monitored.

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.3.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.3, the Permittee shall maintain records in accordance with (1). Records maintained for (1) shall be compiled monthly and shall be complete and sufficient to establish compliance with the HAP and VOC emission limits established in Condition D.3.1 and D.3.3.
- (1) The amount drums stored onsite. Records shall include purchase orders, invoices, material safety data sheets (MSDS), and waste manifests necessary to verify the type and amount drums onsite.
- (b) To document compliance with Condition D.3.4, the Permittee shall maintain a log of the amount (number of drums) onsite.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 and D.3.3 and the data required by D.3.4, 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 quarter being reported.

**SECTION D.4 FACILITY OPERATION CONDITIONS**

- |   |
|---|
| (4) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. |
|---|

**Boilers      *Natural Gas-fired - less than 10 mmBtu/hr***

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

**D.4.1 Particulate Matter (PM)**

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Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 2.26 mmBtu per hour heat input boilers shall be limited to 0.6 pounds per mmBtu heat input.

**Compliance Determination Requirement**

**D.4.2 Testing Requirements [326 IAC 2-8-5(1)]**

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Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4(1).

State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

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

Source Name: Environmental Services of America - IN, Inc.  
Source Address: 604 S. Scott Street, South Bend, IN 46601  
Mailing Address: 604 S. Scott Street, South Bend, IN 46601  
FESOP No.: F141-7448-00056

**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:

- 9 Annual Compliance Certification Letter
- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



State Form 47741 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

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

Source Name: Environmental Services of America - IN, Inc.  
Source Address: 604 S. Scott Street, South Bend, IN 46601  
Mailing Address: 604 S. Scott Street, South Bend, IN 46601  
FESOP No.: F141-7448-00056

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .  
Attach a signed certification to complete this report.

Stack/Vent ID:

Equipment/Operation:

Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit:  
(ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)

Determination Period for this Parameter:  
(ex: 365-day rolling sum, fixed monthly rate)

**9** Permit Has No Rate Limitations for this Parameter.

Content Restriction for this Parameter:  
(ex: maximum of 40% VOC in inks, 0.5% sulfur content)

Demonstration Method for this Parameter:  
(ex: MSDS, Supplier, material sampling & analysis)

**9** Permit Has No Content Limitations for this Parameter.

Comments:

State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Environmental Services of America - IN, Inc.  
Source Address: 604 S. Scott Street, South Bend, IN 46601  
Mailing Address: 604 S. Scott Street, South Bend, IN 46601  
FESOP No.: F141-7448-00056

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

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To


*(can omit boiler affected if only one gas boiler at this plant)*

I certify under penalty of law that at all times, except as otherwise noted above, only natural gas was burned in the indicated boilers during the report period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

### FESOP Quarterly Report

Source Name: Environmental Services of America - IN, Inc.  
 Source Address: 604 S. Scott Street, South Bend, IN 46601  
 Mailing Address: 604 S. Scott Street, South Bend, IN 46601  
 FESOP No.: F141-7448-00056  
 Facility: Caustic Scrubber, Tanks Carbon Adsorber  
 Parameter: Scrubber - pH, Adsorber - VOC Breakthrough  
 Limit: No numerical limit, needed to comply with recordkeeping & reporting conditions.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	Scrubber		Carbon Adsorber		Day	Scrubber		Carbon Adsorber	
	pH	Gen	Break	Gen		pH	Gen	Break	Gen
1					17				
2					18				
3					19				
4					20				
5					21				
6					22				
7					23				
8					24				
9					25				
10					26				
11					27				
12					28				
13					29				
14					30				
15					31				
16					no. of deviation s				

9 No deviation occurred in this quarter.

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Environmental Services of America - IN, Inc.  
Source Address: 604 S. Scott Street, South Bend, IN 46601  
Mailing Address: 604 S. Scott Street, South Bend, IN 46601  
FESOP No.: F141-7448-00056  
Facility: Caustic Scrubber, Tanks Carbon Adsorber  
Parameter: Scrubber - NaOH concentration, Fan & Motor Condition  
Adsorber -Piping Leaks  
Limit: No numerical limit, needed to comply with recordkeeping & reporting conditions.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Week	Scrubber NaOH Conc.	Scrubber Fan & Motor Condition	Carbon Adsorber Piping Leaks
1			
2			
3			
4			
5			
Month			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Environmental Services of America - IN, Inc.  
 Source Address: 604 S. Scott Street, South Bend, IN 46601  
 Mailing Address: 604 S. Scott Street, South Bend, IN 46601  
 FESOP No.: F141-7448-00056  
 Facility: Caustic Scrubber, Tanks Carbon Adsorber  
 Parameter: Scrubber - pH, Adsorber - VOC Breakthrough  
 Limit: 15,000 drums per year

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Past 12 Months	Drums Stored	Drums Processed	Total Drums Onsite
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
<b>12 Month Total</b>			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Environmental Services of America - IN, Inc.  
Source Address: 604 S. Scott Street, South Bend, IN 46601  
Mailing Address: 604 S. Scott Street, South Bend, IN 46601  
FESOP No.: F141-7448-00056  
Facility: Storage Tanks  
Parameter: Throughputs  
Limit: 2,000,000 gallons per year

**Generator S/V ID:** \_\_\_\_\_ **Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_

<b>Past 12 Months</b>	<b>Total (gallons)</b>
<b>1</b>	
<b>2</b>	
<b>3</b>	
<b>4</b>	
<b>5</b>	
<b>6</b>	
<b>7</b>	
<b>8</b>	
<b>9</b>	
<b>10</b>	
<b>11</b>	
<b>12</b>	
<b>12 Month Total</b>	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

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

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

#### Source Background And Description

<b>Source Name:</b>	<b>Environmental Services of America - IN, Inc.</b>
<b>Source Location:</b>	<b>604 S. Scott Street, South Bend, IN 46601</b>
<b>County:</b>	<b>St. Joseph</b>
<b>SIC Code:</b>	<b>4953</b>
<b>Operation Permit No.:</b>	<b>F141-7448-00056</b>
<b>Permit Reviewer:</b>	<b>Richard A. Moore Jr./EVP</b>

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Environmental Services of America - IN, Inc. relating to the operation of a bulk liquid waste and drum waste processing and fuel blending plant.

#### Permitted Emission Units and Pollution Control Equipment

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

- (1) one (1) waste processing area (including one waste drum shredder), identified as Emission Unit ID (EU) 100, with a limited capacity of fifteen thousand (15,000), fifty-five (55) gallon drums per year, using a caustic wet scrubber as control, and exhausting to stack S/V ID 001, installed in 1990.
- (2) one (1) tank farm area, identified as EU 200, consisting of the following ten (10) tanks, with a maximum throughput for all tanks of 2,000,000 gallons per year, using carbon adsorbers as control, and exhausting to stack S/V ID 002, installed in 1986.
  - (a) two (2) 3,775 gallon capacity flat roof storage tanks identified as Tanks 1 and 2, exhausting at one emission point identified as S/V ID 002, and
  - (b) eight (8) 6,195 gallon capacity flat roof storage tanks identified as Tanks 3, 4, 5, 6, 7, 8, 9, and 10, exhausting at one emission point identified as S/V ID 002.
- (3) one (1) empty (shredded) drum processing area, identified as EU 400, with a maximum capacity of fifteen thousand (15,000), empty fifty-five (55) gallon drums per year, and exhausting as fugitive emissions identified as S/V ID 004.

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

#### Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (4) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (5) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (6) Other activities or categories not previously identified. Including: Laboratory Hood Vents and Storage and Process Area Roof Vents.

### **Existing Approvals**

This source has been operating under the following approvals:

- (1) St. Joseph County Health Department (SJC) Permit No. I31 issued on March 18, 1996, and
- (2) RCRA Part B Permit IND 980 590 947, issued on March 1993.

### **Enforcement Issue**

There are no Enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP 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 FESOP application for the purposes of this review was received on December 11, 1996. Additional information was received on August 13, 1997.

### **Emissions Calculations**

See Appendix A: Emissions Calculations for detailed calculations pages 1 through 3.

### **Potential Emissions**

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	0.12
PM-10	0.12
SO <sub>2</sub>	0.01
VOC	116.86
CO	0.40
NO <sub>x</sub>	0.99

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

See attached spreadsheets for detailed calculations on page 1.

HAP	Potential Emissions (tons/year)
Methylene Chloride (Non-VOC)	18.05
Tetrachloroethylene (Non-VOC)	8.21
Trichloroethane (Non-VOC)	5.66
Benzene	0.98
Ethylbenzene	6.12
n-Hexane	3.32
Methanol	17.75
Methyl Ethyl Ketone	6.73
Naphthalene	0.49
Trichloroethylene	8.06
Toluene	63.9
Xylenes	9.26
TOTAL	148.53

See attached spreadsheets for detailed calculations on page 1.

- (a) The potential emissions (as defined in the Indiana Rule) of VOCs 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 emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) 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.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

**Limited Potential To Emit**

- (a) The source has accepted a federally enforceable limit on potential to emit VOCs of less than 99 tons per year, consisting of:
  - (i) 16.1 tons per year for the significant activities; and
  - (ii) 0.07 tons per year for the insignificant activities.

- (b) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs*
EU 100	---	---	---	13.53	---	---	18.47
EU 200	---	---	---	0.06	---	---	0.07
EU 400	---	---	---	2.51	---	---	2.91
Insignificant Activities	0.12	0.12	0.01	0.07	0.40	0.99	0.00
Total Emissions	0.12	0.12	0.01	16.17	0.40	0.99	21.45

\* Note there are several HAPs that are not VOCs therefore, VOC emission will be less than HAPs.

Attached Tables A to C summarize the permit conditions and requirements.

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
TSP	Nonattainment *
PM-10	Attainment
SO <sub>2</sub>	Attainment
OZONE	Maintenance
CO	Attainment
NO <sub>2</sub>	Attainment

\* The area north of Kern Road and East of Pine Road, in St. Joseph County is Classified as nonattainment for PM. This source is located in the nonattainment portion of St. Joseph County.

- (a) Volatile organic compounds (VOC) and oxides of nitrogen 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. St Joseph County has been designated as attainment or unclassifiable for ozone.

### **Federal Rule Applicability**

- (a) The existing eight (8) storage tanks (identified as Tanks T-3 though and T-10), are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels". Because the date of construction was after July 23, 1984, the applicable date for volatile organic liquid storage tanks and the materials stored is a volatile organic liquid. Therefore the provisions of this Subpart apply and the true vapor pressure (TVP) of the material stored is limited to less than 3 kPa (0.507 psia). The facility will comply with the requirements of this rule by storing materials with a TVP of less than 3 kPa.
- (b) The existing two (2) storage tanks (identified as Tanks T-1 and T-2), are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart K, 60.110a, Subpart Ka, and 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels". Regardless of the date of construction, each tank has a storage capacity below the minimum 40 cubic meter (10,567 gallon) applicability threshold of all the three Subparts and, therefore, these facilities are exempt from the provisions of these Subparts.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

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

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

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than ten (10) tons per year of VOCs and is located in St. Joseph County. 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).

#### **326 IAC 2-8-4 (FESOP)**

This source is subject to 326 IAC 2-8-4 (FESOP). By accepting the following limitations the source wide volatile organic compound emissions are limited to less than 99.0 tons per year, the emissions of any single HAP is limited to less than 9.4 tons per year, and any combination of HAP emissions are limited to less than 24 tons per year, therefore the source satisfies the requirements of 326 IAC 2-8 (FESOP) and is not subject to the requirements of 326 IAC 2-7. Therefore, pursuant to this rule, the following conditions apply:

- (a) The one (1) waste processing area (including one waste drum shredder), identified as EU 100 shall limit hours of operation to 3,000 hours per year and limit drum shredding operations to 15,000 drums per year.
- (b) The one (1) tank farm area, identified as EU 200, consisting of the ten (10) tanks, shall limit the total throughputs of organic liquids through all storage tanks to 2,000,000 gallons per twelve (12) month period, rolled on a monthly basis.
- (c) The one (1) empty (shredded) drum processing area, identified as EU 400, shall limit the amount of drums stored onsite to 15,000 drums per year.

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**326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

**326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)**

The natural gas fired boiler(s) with a total source rated heat duty of 2.26 million Btu/hr is subject to 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Hating). Because the rated heat input is less than 10 million Btu/hr, the facility is limited to emissions of less than 0.6 pounds of particulate matter per million Btu. The AP-42 emission factor for this facility is equal to 0.01 pounds of particulate matter per million Btu which is less than the allowable.

**326 IAC 6-4 (Fugitive Dust Emissions)**

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4, fugitive particulate matter emissions shall not be visible crossing the property lines.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

This source is not subject to 326 IAC 6-5 for fugitive particulate matter emissions. Pursuant to 326 IAC 6-5(a), for any source located in a particulate matter non-attainment area which has potential fugitive particulate matter emissions of 25 tons per year or more, a fugitive dust control plan must be submitted, reviewed and approved. This source is located in the portion of St. Joseph County which is in a particulate matter non-attainment area, however, there are no fugitive emissions of particulate matter at this source.

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

This source is not subject to 326 IAC 7-1.1 since no facility has the PTE more than 25 tons per year or 10 lbs per hour. Therefore, pursuant to 326 IAC 7-1.1-1, the requirements of 326 IAC 7-1.1 and 7.2 do not apply.

**326 IAC 8-1-6 (New Facilities)**

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and which are not regulated by other provisions of 326 IAC 8. The drum shredder waste processing facility (EU 100) has greater than 25 tons per year of VOC emissions. Therefore, this source is subject to 326 IAC 8-1-6. This facility will comply with this regulation by using the caustic scrubber for control as required in the SJC Permit No. I31 issued on March 18, 1996,

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source does not have potential VOC

emissions at, or in excess of 100 tons per year; therefore, this rule does not apply.

### **Compliance Requirements**

Permits issued under 326 IAC 2-8 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, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D 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 in permit Section D. 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 drum shredder and waste processing area, controlled by a caustic scrubber, (EU 100) has applicable compliance monitoring conditions as specified below:
  - (a) The hours of operation and number of drums processed shall be limited such that the actual emissions are less than 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs, in order to ensure compliance with 326 IAC 2-8 (FESOP).
  - (b) The hours of operation of the shredder and caustic scrubber are limited to 3,000 hours per year.
  - (c) The processing of drums is limited to 15,000 drums per year.
  - (d) The operation of the caustic scrubber is required at all times the drum shredder and waste processing area are in operation.
  - (e) Daily pH monitoring and Weekly analysis for NaOH concentration shall be recorded when the caustic scrubber is operating.
  - (f) Test for HAPs and volatile organic compound emissions at the caustic scrubber exhaust stack during operation of the drum shredder and waste processing area. Testing shall be performed in accordance to 326 IAC 3-2.1 using methods acceptable to the Commissioner. The stack test shall be performed in accordance with the RCRA Part B Permit IND 980 590 947; or within 18 to 24 months of issuance of the FESOP, and repeated no less than once every 5 years thereafter, whichever condition is more restrictive.

These monitoring conditions are necessary because the caustic scrubber for the drum

shredder and waste processing area must operate properly to ensure compliance with 326 IAC 2-7 (FESOP).

2. Storage tanks T-1 through T-10 (EU 200) have applicable compliance monitoring conditions as specified below:
  - a) The sum of the throughputs of organic liquids through all storage tanks is limited to 2,000,000 gallons per twelve (12) month period, rolled on a monthly basis. This limit is necessary in order to ensure compliance with 326 IAC 2-7 (FESOP).
  - b) Quarterly reports shall be submitted to the OAM. These reports shall include the gallons of throughput for each tank per month and the sum of all tank throughputs per month. The reports shall also include deviations from compliance monitoring criteria, certification that corrective actions were taken, or certification that no deviations occurred during the reporting period.
  - c) Records of the types of organic liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of inspections performed on the storage vessels shall be maintained for a minimum of 36 months and made available upon request of the OAM.
  - d) Daily inspection of the saturation indicator on the carbon adsorber shall be recorded.

These monitoring conditions are necessary because the limit on the total tank throughput for these storage tanks is needed to ensure compliance with 326 IAC 2-7 (FESOP).

- (3) The drum storage area, (EU 400) has applicable compliance monitoring conditions as specified below:
  - (a) The storage of drums is limited to 15,000 drums per year.
  - (b) The conditions stated in the RCRA Part B Permit IND 980 590 947, issued in March 1993 shall be complied with.

These monitoring conditions are necessary because the drum storage area must operate properly to ensure compliance with 326 IAC 2-7 (FESOP).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. 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 Management (OAM) FESOP Application Form GSD-08.

- (a) This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

### **Conclusion**

The operation of this bulk liquid waste and drum waste processing and fuel blending plant will be subject to the conditions of the attached proposed FESOP No. F141-7448-00056.

Table A

<b>Stack/Vent ID: 001</b>					
<b>Stack/Vent Dimensions:</b>		Ht:	Dia:	Temp:	Flow:
<b>Emission Unit: 100</b>					
<b>Date of Construction: 1990</b>					
<b>Alternative Scenario:</b>					
<b>Pollution Control Equipment: Caustic Scrubber</b>					
<b>General Description of Requirement:</b>	record keeping & reporting				
<b>Numerical Emission Limit:</b>	24 tons HAPs/yr 9.4 tons/yr any single HAP 99 tons VOC/yr*				
<b>Regulation/Citation:</b>	326 IAC 2-8-4				
<b>Compliance Demonstration:</b>	record keeping & reporting				
<b>PERFORMANCE TESTING</b>					
<b>Parameter/Pollutant to be Tested:</b>	HAP and VOC emissions lbs/hr	when drum shredder & waste processing	are operating		
<b>Testing Method/Analysis:</b>	method approved by Commissioner				
<b>Testing Frequency/Schedule:</b>	within 18 - 24 months & once every 5 years	or per RCRA Part B permit requirements			
<b>Submittal of Test Results:</b>	within 45 days of testing				
<b>COMPLIANCE MONITORING</b>					
<b>Monitoring Description:</b>	pH monitoring	NaOH concentration			
<b>Monitoring Method:</b>	See RCRA permit	See RCRA permit			
<b>Monitoring Regulation/Citation:</b>	See RCRA permit	See RCRA permit			
<b>Monitoring Frequency:</b>	daily	weekly			
<b>RECORD KEEPING</b>					
<b>Parameter/Pollutant to be Recorded:</b>	Number of drums processed	Number of hours operated			
<b>Recording Frequency:</b>	monthly	monthly			
<b>Submittal Schedule of Reports:</b>	Quarterly	Quarterly			
<b>REPORTING REQUIREMENTS</b>					
<b>Information in Report:</b>	pH, No. Drums, hours operated,	NaOH concentration			
<b>Reporting Frequency/Submittal:</b>	within 30 days after each calendar quarter				
<b>Additional Comments:</b>					

\* Reflects source-wide FESOP limit of 99 tons volatile organic compounds per year, 24 tons per year for

any combination of HAPs and 9.4 tons per year for any single HAP.

Table B

<b>Stack/Vent ID: 002</b>				
<b>Stack/Vent Dimensions:</b> Ht: Dia: Temp: Flow:				
<b>Emission Unit: 200</b>				
<b>Date of Construction: 1986</b>				
<b>Alternative Scenario:</b>				
<b>Pollution Control Equipment:</b> carbon adsorber(s)				
<b>General Description of Requirement:</b>	record keeping & reporting			
<b>Numerical Emission Limit:</b>	24 tons HAPs/yr 9.4 tons/yr any single HAP 99 tons VOC/yr*			
<b>Regulation/Citation:</b>	326 IAC 2-8-4			
<b>Compliance Demonstration:</b>	record keeping & reporting			
<b>PERFORMANCE TESTING</b> N/A				
<b>Parameter/Pollutant to be Tested:</b>				
<b>Testing Method/Analysis:</b>				
<b>Testing Frequency/Schedule:</b>				
<b>Submittal of Test Results:</b>				
<b>COMPLIANCE MONITORING</b> N/A				
<b>Monitoring Description:</b>				
<b>Monitoring Method:</b>				
<b>Monitoring Regulation/Citation:</b>				
<b>Monitoring Frequency:</b>				
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	organic liquid throughputs			
<b>Recording Frequency:</b>	monthly			
<b>Submittal Schedule of Reports:</b>	Quarterly			
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>	total throughput for all facilities			
<b>Reporting Frequency/Submittal:</b>	within 30 days after each calendar quarter			
<b>Additional Comments:</b>				

\* Reflects source-wide FESOP limit of 99 tons volatile organic compounds per year, 24 tons per year for any combination of HAPs and 9.4 tons per year for any single HAP.

Table C

<b>Stack/Vent ID: 004</b>				
<b>Stack/Vent Dimensions:</b> Ht: Dia: Temp: Flow:				
<b>Emission Unit: 400</b>				
<b>Date of Construction: N/A</b>				
<b>Alternative Scenario:</b>				
<b>Pollution Control Equipment: N/A</b>				
<b>General Description of Requirement:</b>	record keeping & reporting			
<b>Numerical Emission Limit:</b>	24 tons HAPs/yr 9.4 tons/yr any single HAP 99 tons VOC/yr*			
<b>Regulation/Citation:</b>	326 IAC 2-8-4			
<b>Compliance Demonstration:</b>	record keeping & reporting			
<b>PERFORMANCE TESTING N/A</b>				
<b>Parameter/Pollutant to be Tested:</b>				
<b>Testing Method/Analysis:</b>				
<b>Testing Frequency/Schedule:</b>				
<b>Submittal of Test Results:</b>				
<b>COMPLIANCE MONITORING</b>				
<b>Monitoring Description:</b>	See RCRA permit			
<b>Monitoring Method:</b>	See RCRA permit			
<b>Monitoring Regulation/Citation:</b>	See RCRA permit			
<b>Monitoring Frequency:</b>	See RCRA permit			
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	Number of drums processed			
<b>Recording Frequency:</b>	monthly			
<b>Submittal Schedule of Reports:</b>	Quarterly			
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>	pH, No. Drums			
<b>Reporting Frequency/Submittal:</b>	within 30 days after each calendar quarter			
<b>Additional Comments:</b>				

\* Reflects source-wide FESOP limit of 99 tons volatile organic compounds per year, 24 tons per year for

any combination of HAPs and 9.4 tons per year for any single HAP.

**Appendix A: Emission Calculations  
HAP Emissions Summary  
POTENTIAL UNCONTROLLED EMISSIONS**

**Company Name: Environmental Services of America - IN, Inc.  
Address City IN Zip: 604 S. Scott Street, South Bend, IN 46601  
FESOP: F141-7448-00056  
Reviewer: Richard A. Moore Jr./EVP  
Date: 09/24/97**

Source Identification	Service	HC Emissions Tons/yr	VOC Emissions Tons/yr	Non-HAP VOCs			Non-VOC Acetone	Non-VOC HAPs			HAP Emissions (tons/yr)									
				Ethyl-Alcohol	Ethyl-Acetate	Isopropyl Alcohol		Methylene Chloride	Tetrachloro ethylene	Trichloro ethane	Benzene	Ethyl-Benzene	n-Hexane	Methanol	MEK	Naphthalene	Trichloro ethylene	Toluene	Xylenes	Total
T-1		163.14	80.97	1.17	8.42	3.33	56.21	22.06	0.75	3.15	8.8	0.77	7.32	5.25	32.46	0	1.51	9.64	2.3	94.01
T-2		163.14	80.97	1.17	8.42	3.33	56.21	22.06	0.75	3.15	8.8	0.77	7.32	5.25	32.46	0	1.51	9.64	2.3	94.01
T-3		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-4		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-5		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-6		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-7		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-8		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-9		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-10		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
Tanks	Subtotal, lbs/yr	4780.44	2372.58	34.26	246.6	97.7	1647.22	646.52	21.82	92.3	257.76	22.42	214.56	153.78	951.32	0	44.38	282.56	67.24	2754.66
EU 200	Subtotal, TPY	2.39	1.19	0.02	0.12	0.05	0.82	0.32	0.01	0.05	0.13	0.01	0.11	0.08	0.48	0	0.02	0.14	0.03	1.38
Potential Uncontrolled																				
Tanks	Subtotal, lbs/yr	4780.44	2372.58	34.26	246.6	97.7	1647.22	646.52	21.82	92.3	257.76	22.42	214.56	153.78	951.32	0	44.38	282.56	67.24	2754.66
EU 200	Subtotal, TPY	2.39	1.19	0.02	0.12	0.05	0.82	0.32	0.01	0.05	0.13	0.01	0.11	0.08	0.48	0	0.02	0.14	0.03	1.38
Processing	lbs/yr	551976.4	226183.2		38859.36	58201.44	263509.6	35215.2	16118.4	10950	1401.6	11913.6	6307.2	35215.2	11388		15943.2	126319.2	17695.2	288466.8
EU 100	TPY	275.99	113.09	0	19.43	29.1	131.75	17.61	8.06	5.48	0.7	5.96	3.15	17.61	5.69	0	7.97	63.16	8.85	144.23
Drum	Fugitives	5810.749	5024.54					228.7867	278.7113	278.7113	302.8484	299.135	113.465	135.9517	1114.02	989.2085	125.5336	1196.54	747.8375	5810.75
EU 400	Subtotal, TPY	2.91	2.51	0	0	0	0	0.11	0.14	0.14	0.15	0.15	0.06	0.07	0.56	0.49	0.06	0.6	0.37	2.91
Insignificant	Subtotal, lbs/yr	144.54	144.54																	0
	Subtotal, TPY	0.07	0.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	lbs/yr	562712.1	233724.9	34.26	39105.96	58299.14	265156.8	36090.51	16418.93	11321.01	1962.208	12235.16	6635.225	35504.93	13453.34	989.2085	16113.11	127798.3	18510.28	297032.2
	tons/yr	281.36	116.86	0.02	19.55	29.15	132.58	18.05	8.21	5.66	0.98	6.12	3.32	17.75	6.73	0.49	8.06	63.9	9.26	148.52
	% of VOC			0.02%	16.73%	24.94%	113.45%	15.45%	7.03%	4.84%	0.84%	5.24%	2.84%	15.19%	5.76%	0.42%	6.90%	54.68%	7.92%	127.09%

Note: All storage tank emissions estimated using EPA's TANKS 3.0 software program.

**Appendix A: Emission Calculations  
HAP Emissions Summary  
LIMITED EMISSIONS (CONTROLLED)**

**Company Name: Environmental Services of America - IN, Inc.  
Address City IN Zip: 604 S. Scott Street, South Bend, IN 46601  
FESOP: F141-7448-00056  
Reviewer: Richard A. Moore Jr./EVP  
Date: 09/24/97**

Source Identification	Service	HC Emissions Tons/yr	VOC Emissions Tons/yr	Non-HAP VOCs			Non-VOC Acetone	Non-VOC HAPs			HAP Emissions (tons/yr)									
				Ethyl-Alcohol	Ethyl-Acetate	Isopropyl Alcohol		Methylene Chloride	Tetrachloro ethylene	Trichloro ethane	Benzene	Ethyl-Benzene	n-Hexane	Methanol	MEK	Naphthalene	Trichloro ethylene	Toluene	Xylenes	Total
T-1		163.14	80.97	1.17	8.42	3.33	56.21	22.06	0.75	3.15	8.8	0.77	7.32	5.25	32.46	0	1.51	9.64	2.3	94.01
T-2		163.14	80.97	1.17	8.42	3.33	56.21	22.06	0.75	3.15	8.8	0.77	7.32	5.25	32.46	0	1.51	9.64	2.3	94.01
T-3		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-4		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-5		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-6		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-7		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-8		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-9		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
T-10		556.77	276.33	3.99	28.72	11.38	191.85	75.3	2.54	10.75	30.02	2.61	24.99	17.91	110.8	0	5.17	32.91	7.83	320.83
Tanks	Subtotal, lbs/yr	4780.44	2372.58	34.26	246.6	97.7	1647.22	646.52	21.82	92.3	257.76	22.42	214.56	153.78	951.32	0	44.38	282.56	67.24	2754.66
EU 200	Subtotal, TPY	2.39	1.19	0.02	0.12	0.05	0.82	0.32	0.01	0.05	0.13	0.01	0.11	0.08	0.48	0	0.02	0.14	0.03	1.38
Potential Controlled																				
Tanks	Subtotal, lbs/yr	239.02	118.63	1.71	12.33	4.89	82.36	32.33	1.09	4.62	12.89	1.12	10.73	7.69	47.57	0	2.22	14.13	3.36	137.73
EU 200	Subtotal, TPY	0.12	0.06	0	0.01	0	0.04	0.02	0	0	0.01	0	0.01	0	0.02	0	0	0.01	0	0.07
Processing	lbs/yr	39885	27063	75	240	2955	4197	3900	1770	300	1260	390	7710	273	1860	14250	1020	36930		
EU 100	TPY	19.94	13.53	0	0.04	0.12	1.48	2.1	1.95	0.89	0.15	0.63	0.2	3.86	0.14	0	0.93	7.13	0.51	18.47
Drum	Fugitives	5810.749	5024.54					228.7867	278.7113	278.7113	302.8484	299.135	113.465	135.9517	1114.02	989.2085	125.5336	1196.54	747.8375	5810.75
EU 400	Subtotal, TPY	2.91	2.51	0	0	0	0	0.11	0.14	0.14	0.15	0.15	0.06	0.07	0.56	0.49	0.06	0.6	0.37	2.91
Insignificant	Subtotal, lbs/yr	144.54	144.54																	0
	Subtotal, TPY	0.07	0.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	lbs/yr	46079.31	32350.71	1.71	87.33	244.89	3037.36	4458.117	4179.801	2053.331	615.7384	1560.255	514.195	7853.642	1434.59	989.2085	1987.754	15460.67	1771.198	42878.48
	tons/yr	23.04	16.18	0.00	0.04	0.12	1.52	2.23	2.09	1.03	0.31	0.78	0.26	3.93	0.72	0.49	0.99	7.73	0.89	21.44
	% of VOC			0.00%	0.03%	0.10%	1.30%	1.91%	1.79%	0.88%	0.27%	0.67%	0.22%	3.36%	0.62%	0.42%	0.85%	6.61%	0.76%	18.35%

Note: All storage tank emissions estimated using EPA's TANKS 3.0 software program.  
EU 100 Limited to 15,000 drums processed and 3,000 hours per year. Emissions are based on 3,000 hours times lbs/hr from stack tests.

**Appendix A: Emission Calculations  
Natural Gas Combustion**

**Company Name: Environmental Services of America - IN, Inc.  
Address City IN Zip: 604 S. Scott Street, South Bend, IN 46601  
FESOP: F141-7448-00056  
Reviewer: Richard A. Moore Jr./EVP  
Date: 09/24/97**

**1. Emissions from facilities rated < 0.3 MMBtu/hr**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.26	19.8

Heat Input Capacity includes:

Emission Factor in lb/MMCF	Pollutant						HAPs
	PM	PM10	SO2	NOx	VOC	CO	
11.2	11.2	0.6	94.0	7.3	40.0		
Potential Emission in tons/yr	0.11	0.11	0.01	0.93	0.07	0.40	0.00

Methodology:

MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, Residential Furnaces (no SCC)  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**2. Emissions from facilities rated < 10.0 MMBtu/hr**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.26	19.8

Heat Input Capacity includes:

Emission Factor in lb/MMCF	Pollutant						HAPs
	PM	PM10	SO2	NOx	VOC	CO	
12.0	12.0	0.6	100.0	5.3	21.0		
Potential Emission in tons/yr	0.12	0.12	0.01	0.99	0.05	0.21	0.00

Methodology:

MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36  
Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Worst Case is higher of 1 or 2	Pollutant						HAPs
	PM	PM10	SO2	NOx	VOC	CO	
Total Potential Emissions from both in tons/yr	0.12	0.12	0.01	0.99	0.07	0.40	0.00

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

Addendum to the  
Technical Support Document for Federally Enforceable State Operating  
Permit (FESOP)

<b>Source Name:</b>	<b>Environmental Services of America - IN, Inc.</b>
<b>Source Location:</b>	<b>604 S. Scott Street, South Bend, IN 46601</b>
<b>SIC Code:</b>	<b>4953</b>
<b>County:</b>	<b>St. Joseph</b>
<b>Operation Permit No.:</b>	<b>F141-7448-00056</b>
<b>Permit Reviewer:</b>	<b>Richard A. Moore Jr./EVP</b>

On November 13, 1997, the Office of Air Management (OAM) had a notice published in The South Bend Tribune, South Bend, Indiana, stating that Environmental Services of America - IN, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a bulk liquid waste and drum waste processing and fuel blending plant. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the FESOP:

1. Condition B.1 of the FESOP has been changed from:

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

and replaced with a new condition which reads as follows (changes in bold for emphasis):

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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

2. The following changes shown in bold letters (for emphasis) have been made to Condition B.6 of the FESOP:

B.6 Severability [326 IAC 2-8-4(4)]

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

3. The following changes shown in bold letters (for emphasis) have been made to Subsection (c) of Condition B.8 of the FESOP:

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records **to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

4. The following changes shown in bold letters (for emphasis) have been made to Condition B.11 of the FESOP:

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.**

(c) A responsible official is defined at **326 IAC 2-7-1(34)**.

5. The following changes shown in bold letters (for emphasis) have been made to Condition B.12 of the FESOP. Subsections (a) and (b) of Condition B.12 of the FESOP have been revised and subsection (d) has been deleted.

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The certification 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 Data Section, Office of Air Management  
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, OAM, on or before the date it is due.**
- (c) The annual compliance certification report shall include the following:
- (1) The 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

**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).**

6. The following changes shown in bold letters (for emphasis) have been made to Condition B.13 of the FESOP:

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) **If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:**
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing **emission units and associated** 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.
- (b) **The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.**

- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

- 7. The last paragraph of Subsection (b)(4) of Condition B.14 of the FESOP has been deleted.
- 8. The following changes shown in bold letters (for emphasis) have been made to Condition B.15 of the FESOP:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached **Emergency/Deviation Occurrence Reporting Form** or its substantial equivalent.

- (c) **Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.**

- 9. The following changes shown in bold letters (for emphasis) have been made Subsection (a) and subsection (b)(1) of Condition B.17 of the FESOP:

The rule cited in paragraph (a) has been changed to 326 IAC 2-7-1(21).

The first sentence of paragraph (b)(1) has been deleted.

Section (b)(1)(B) has been revised to read as follows:

- (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, OAM, on or before the date it is due. [326 IAC 2-5-3]**

- 10. The following changes shown in bold letters (for emphasis) have been made to Subsections (b) and (d) of Condition B.19 of the FESOP:

- (b) Minor modification of this permit shall follow the procedures specified under **326 IAC 2-7-12(b), except as provided by 326 IAC 2-8-11(c).**

- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application **provided that the change has**

**received any approval required by 326 IAC 2-1.** After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

11. The following changes shown in bold letters (for emphasis) have been made to Subsection (d) of Condition B.20 of the FESOP:

(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, **review by affected states**, and review by U.S. EPA, as they apply to permit issuance and renewal.

12. The following changes shown in bold letters (for emphasis) have been made to Condition B.22 of the FESOP:

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(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 2-8-15(a) and the following additional condition:

13. The following changes shown in bold letters (for emphasis) have been made to Subsection (b) of Condition B.23 of the FESOP:

(b) For each such **Section 502(b)(10) of the Clean Air Act** change, the required written notification shall include the following:

The last rule cite in (b) has been changed to 326 IAC 2-7-1(**34**).

14. The following changes shown in bold letters (for emphasis) have been made to Condition B.24 of the FESOP:

B.24 Construction Permit Requirement [326 IAC 2]

**Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997**, modification, construction, or reconstruction shall be **approved** as required by and in accordance with 326 IAC 2.

15. The following changes shown in bold letters (for emphasis) have been made to Subsection (b) of Condition B.26 of the FESOP:

(b) The written notification shall be sufficient to transfer the permit to the new owner **by an administrative amendment pursuant to 326 IAC 2-8-10.**

16. The following changes shown in bold letters (for emphasis) have been made to Condition B.27 of the FESOP:

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, **within thirty (30) calendar days of receipt of a billing, or in a time period** consistent with the fee schedule established in 326 IAC 2-8-16.

- (b) Failure to pay may result in administrative enforcement action **or** revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-**0425** (ask for OAM, **Technical Support and Modeling Section**), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

17. The following changes shown in bold letters (for emphasis) have been made to Conditions C.1 of the FESOP:

The last sentence of C.1(c) has been deleted.

18. The following changes shown in bold letters (for emphasis) have been made to Conditions C.3 of the FESOP:

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. **The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

19. The following changes shown in bold letters (for emphasis) have been made to Conditions C.5 of the FESOP:

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

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

20. The following changes shown in bold letters (for emphasis) have been made to Conditions C.6 of the FESOP:

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

**All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation, as described in Section D of this permit.**

21. The following changes shown in bold letters (for emphasis) have been made to Conditions C.8 of the FESOP:

C.8 Performance Testing [326 IAC 3-2.1]

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), **except as provided elsewhere in this permit**, utilizing methods approved by IDEM, OAM.

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 Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days before the intended test date.

- (b) **All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.**

22. The following changes shown in bold letters (for emphasis) have been made to Conditions C.9 of the FESOP:

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented **as required by this permit**. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

The last rule cite has been changed to 326 IAC 2-7-1(34).

23. The following changes shown in bold letters (for emphasis) have been made to Conditions C.11 of the FESOP:

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, **or other approved methods as** specified in this permit.

24. The following changes shown in bold letters (for emphasis) have been made to Conditions C.12 (b), (c), and (f) of the FESOP:

- (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:
- (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).

- (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 is federally enforceable.**

25. The following changes shown in bold letters (for emphasis) have been made to Conditions C.13 of the FESOP:

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

26. The following changes shown in bold letters (for emphasis) have been made to Conditions C.14 (a)(5), (b), (c) and (d) of the FESOP:

- (a) **(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :**
- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and**
- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.**
- (b) For each compliance monitoring condition of this permit, appropriate **response steps** shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the **response steps within the time prescribed in the Compliance Response Plan**, shall constitute a violation of the permit unless taking the **response steps** set forth in the **Compliance Response Plan** would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further **response steps** for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further **response steps** providing that 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 an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) **The process has already returned to operating within “normal” parameters and no response steps are required.**
- (d) Records shall be kept of all instances in which the **compliance related information was** not met and of all **response steps** 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.

27. The following changes shown in bold letters (for emphasis) have been made to Conditions C.15 of the FESOP:

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.**
- (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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.** Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

28. The following changes shown in bold letters (for emphasis) have been made to Conditions C.17 (a) and (b) of the FESOP:

- (a) **With the exception of performance tests conducted in accordance with Section C- Performance Testing,** all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the

equipment is operating at normal representative conditions.

- (b) **As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above**, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

29. The following changes shown in bold letters (for emphasis) have been made to Conditions C.18 (c)(4) of the FESOP:

- (4) **Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.**

30. The following changes shown in bold letters (for emphasis) have been made to Conditions C.19 of the FESOP:

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) **To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**
- (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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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, OAM on or before the date it is due.**
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) **All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**
- (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
  - (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
  - (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
  - (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

**A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.**

- (f) **Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.**
- (g) 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.

31. The reference to "(FESOP)" has been removed from Conditions D.1.1, D.1.2, and D.3.1, since the cited regulation refers to the Part 70 Permit program.
32. The word "compiled" has replaced the word "taken" in Conditions D.1.7(a), D.2.6(a), and D.3.4(a), to better reflect how the data is to be collected.
33. The following changes shown in bold letters (for emphasis) have been made to Condition D.1.1 to clarify the requirements are on a 12 month rolling basis.

**The following limitations apply to this facility:**

- a. This facility shall limit hours of operation to 3,000 hours per **twelve (12) month period, rolled on a monthly basis and** on the emission rate of 4.75 pounds per hour of toluene and 12.31 pounds per hour of all HAPs. **During the first 12 months of operation under this permit, the sum of the hours shall be limited such that the total hours divided by the accumulated months of operation shall not exceed 250 hours per month.**
- b. **This facility shall also** limit drum shredding operations to 15,000 drums per **twelve (12) month period, rolled on a monthly basis. During the first 12 months of operation under this permit, the sum of the drums shredded shall be limited such**

**that the total drums shredded divided by the accumulated months of operation shall not exceed 1,250 drums per month.**

34. The following changes shown in bold letters (for emphasis) have been made to Condition D.1.4 have been made to remove references to other permits:

“The Permittee shall test for HAP and VOC emissions from the exhaust stack in conformance with source operation condition number C.5. **The Permittee shall perform HAP and VOC testing utilizing approved methods for the applicable pollutants, or other methods as approved by the Commissioner.** The stack test shall be performed within 18 to 24 months **after** issuance of **this permit** and repeated **at least** once every **(five)** 5 years **from the date of this valid compliance demonstration.**”

35. The following changes shown in bold letters (for emphasis) have been made to Condition D.1.7 have been made:

Under (a), the reference to conditions “(1) through (6)” has been corrected to “(1) through **(3)**” to correctly reflect the number of conditions.

Condition (b) and (c) have been expanded to “(b), (c) and (d)”, as follows:

- (b) To document compliance with **this condition**, the Permittee shall maintain a log of daily readings, weekly concentrations, hours of operation and amount (number of drums) processed.
- (c) **The Permittee shall maintain a log of all** additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

36. The following addition has been made to Condition D.2.5 to clarify the requirements:

“These readings shall provide the baseline for determining VOC breakthrough on the carbon adsorbers.”

37. The following changes have been made to Condition D.2.6(a) to simplify the recordkeeping.

Condition D.2.6(a)(3) has been removed and the conditions renumbered (1) through (6) and the reference to Condition D.1.1 has been changed to D.2.1.

38. The following changes shown in bold letters (for emphasis) have been made to Condition D.3.1 to clarify the requirements are on a 12 month rolling basis.

“This facility shall limit drum shredding operations to 15,000 drums per **twelve (12) month period, rolled on a monthly basis.** **During the first 12 months of operation under this permit, the sum of the drums shredded shall be limited such that the total drums shredded divided by the accumulated months of operation shall not exceed 1,250 drums**

**per month. “**

39. The following changes have been made to Condition D.3.4(a) to simplify the recordkeeping.

The reference to conditions (1) through (6) has been changed to reflect that only (1) conditions is listed.

40. The references on the FESOP Quarterly Reports (revised pages 36 and 37 ) under “Limit: See RCRA Part B Permit” have been changed to reflect that there is no numerical limitation required, but that the recordkeeping and reporting requirements were a previous permit requirement.