INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 19, 2024

Mr. Chris Ray
Heritage Environmental Services, LLC
7901 West Morris Street
Indianapolis, IN 46204

Re: Class 2 Permit Modification INI24-1
Heritage Environmental Services
Indianapolis, Indiana
IND093219012

Dear Mr. Ray:

IDEM received your March 20, 2024, Class 2 Permit Modification request (VFC #s 83618654, 83614924, and 83632736). The modification addresses the automation of the filter presses.

Your permit modification request is approved, and the revised pages of your modified hazardous waste permit are enclosed. The following sections of the permit have been modified:

Permit Conditions;
Attachment D, Process Information; and
Attachment I, Closure Plan.

Any aggrieved party has the right to appeal this decision pursuant to IC 4-21.5-3-7 (see enclosure).

If you have questions, please contact Paula Bansch at pbansch@idem.in.gov or (317) 232-3243.

Sincerely,

Donald W. Stilz, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

Enclosure

cc: Mr. Jeff Teague, IDEM (with enclosure)
Ms. Theresa Pichtel, IDEM (with enclosure)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
HAZARDOUS WASTE MANAGEMENT PERMIT

Name of Permittee: Heritage Environmental Services, LLC

Facility Location: 7901 West Morris Street, Indianapolis

EPA Identification Number: IND093219012

Issuance Date: December 31, 2019

Expiration Date: December 31, 2024

Date	Type	Description
August 2020	Class 2	CSAs 16, 17, 18
September 2021	Class 1	Contingency Plan
June 2022	Class 1	Contingency Plan
October 2022	Class 1	Contingency Plan
May 2023	Class 1	Contingency Plan
January 2024	Class 1	Tank Piping and QR Guide
June 2024	Class 2	Filter Presses

Authorized Activities

Pursuant to Indiana Environmental Statutes (IC 13) and the rules promulgated thereunder and codified in Title 329 of the Indiana Administrative Code, Article 3.1 (329 IAC 3.1), the State permit conditions (hereinafter called the permit) of the Resource Conservation and Recovery Act of 1976 (RCRA) permit are issued to Heritage Environmental Services, LLC (HES) (hereinafter called the Permittee) to operate a hazardous waste facility located in Indianapolis, Indiana, Section 15, Township 15 North, Range 2 East at latitude 39^0 44' 520" and longitude 68^0,18' 035" Clermont Quadrangle, on the U.S. Geological Survey topographic map.

The State RCRA program is authorized under 40 CFR Part 271 and Section 3006 of RCRA to administer the hazardous waste management program in lieu of the Federal program, including administration of most of the Hazardous and Solid Waste Amendments (HSWA) of 1984.

Unit constructed	Change in Plant Capacity (gallons)
CSA 16	32,680
CSA 17	145,200
CSA 18	33,320
CSA 19	32,640
CSA 20	130,560

C. Within one-hundred eight (180) days after the issuance of this permit, the Permittee must update the closure cost estimate and financial assurance to adjust for the total volume of Tanks J, K and L of 2,685 gallons.

D. For the following items that have not been constructed (i.e., Replacement Filter Presses FP1 – FP6) Heritage must do the following:

1. At least fifteen (15) days before closing the existing filter press, notify IDEM of the partial closure of the filter press.

2. At least fourteen (14) days prior to beginning construction/installation of each replacement filter press, the Permittee must notify IDEM of the anticipated installation date.

3. Within one (1) year after beginning construction, the Permittee shall either complete construction/installation of the unit or provide IDEM with a status of the construction of the unit, including any problems encountered and an anticipated schedule for completion of construction/installation.

4. The Permittee must notify IDEM in writing after the construction/installation of each of replacement filter press is complete and include documentation that a leak test has been performed.

5. If fifteen (15) days have passed since the Permittee notified IDEM in writing of the completion of construction/installation of a filter press unit, and IDEM has not indicated a need for inspection or additional information, the Permittee is authorized to place the unit in service.

Item	Item Date	Document	Date	Location in Document	# of Pages	Other	VFC Document
Tank Integrity Assessment – Tank 35	6/22/1995 With updates in 2003, 2006, 2012, 2014, 2017 and 2023. See Appendix F for details	RCRA Permit Renewal Application Revision 0 INI 23CR3027	November 2017 October 2023	Section D Tank Storage & Treatment Wastewater Treatment Tank Volume 10	TIA – 11 AP A – 2 AP B – 2 AP C – 22 AP D – 2 AP E – 3 AP F – 4	Information Referenced in TIA located in Tank 36 Integrity Assessment • Secondary Containment Capacity information, (Appendix D) • Chemical-resistant water stops (Appendix E) • Impermeable coating (Appendix F) • Ancillary equipment (Appendix H)	82620668 83551496
Tank Integrity Assessment – Tank 36	6/22/1995 With updates in 2003, 2006, 2012, 2014, 2017 and 2023. See Appendix I for details	RCRA Permit Renewal Application Revision 0 INI 23CR3027	November 2017 October 2023	Section D Tank Storage & Treatment Wastewater Treatment Tank Volume 10	TIA – 11 AP A – 2 AP B – 2 AP C – 22 AP D – 11 AP E – 16 AP F – 31 AP G – 2 AP H – 103 AP I – 4		82620668 83551496
Tank Integrity Assessment – Tank 73	June 2012. With updates in 2012, 2017 and 2024. See Appendix F for details	INI 24CR1017	March 2024	Section D Tank Storage & Treatment Wastewater Treatment Tank Volume 10	TIA – 11 AP A – 2 AP B – 3 AP C – 11 AP D – 3 AP E – 85 AP F – 2		83648640

D-2c **New Tank Systems**

D-2c(1) **Assessment of New Tank System's Integrity: 40 CFR 264.192(a), 270.16(a) and (e)**

The Tank Integrity Assessment for Tank 73 has been reviewed and certified by a qualified professional engineer. The tank is constructed in accordance with the requirements in the TIA, which has been submitted as confidential business information.

D-2c(2) **Description of Tank Installation and Testing Plan and Procedures: 40 CFR 264.192(b)(e), 270.16(f)**

Prior to placing Tank 73 in operation, the tank is inspected for the presence of weld breaks, punctures, scrapes of protective coatings, cracks, corrosion, and other signs of structural damage or inadequate construction/installation. Tank 73 is tested for tightness prior to placing it in use. If the tank system is not found to be tight, repairs necessary to remedy the leak(s) in the system are performed to the tank system being placed into use. A written statement by the persons required to supervise the installation of the tank system in accordance with the requirements of 40 CFR 264.192(b) attesting to the proper installation, is obtained and kept on file at the facility. The written statement will include the certification statement as required in 40 CFR 201.11.

D-2d **Containment and Detection of Releases: 40 CFR 264.193**

D-2d(1) **Plans and Description of Design, Construction, and Operation of Secondary Containment System: 40 CFR 264.193(b) through (f), 270.16(g)**

Tank 73 is used as an equalization tank for the storage of wastewater accumulating in filterpress drip pans and pumping of liquids from the sump installed in Solids Handling Building. During a press cycle, a core blow down is performed that produces approximately 11 gallons that flows to Tank 73. After a press cycle, each filter is washed with high pressure water. Each washing cycle will produce approximately 390 gallons of wash water that flows to Tank 73. Periodically, the presses are flushed with acidic rinse water to keep calcium-based scale from building up on the press plates. This rinse water flows to Tank 73 through the drip pan drain lines and mixes with the neutral to basic wastewaters in Tank 73. The addition of the rinse water appears to have minimal impact on the composition of the wastewater as it is pumped from Tank 73 to Tank C or D. Tank 73 is a double-walled linear polyethylene (LLDPE) tank. Secondary containment by ancillary equipment is provided by Solids Handling Building.

D-2d(1)(a) **Tank Age Determination: 40 CFR 264.193(a), 270.16(g)**

Tank 73 is a new tank system.

D-2d(1)(b) **Requirements for Secondary Containment and Leak Detection: 40 CFR 264.193(b)(c), 264.1101(b)(3)(iii), 270.16(g)**

The materials of construction used for Tank 73 are linear polyethylene (LLDPE) including the secondary containment. Tank 73 is a double-wall tank system. Polyethylene is designed to handle a wide variety of wastes and wastewaters from acids to alkalis.

Precipitation is not a factor in the design of the secondary containment system as the tank system is a double-wall LLDPE tank located inside a building. The tank integrity assessment provides detailed information on the double-walled LLDPE tank, which is designed to ASTM D 1998-06.

Leak detection is accomplished by a continuous interstitial monitoring device installed between the inner and outer wall of the double-walled tank that will indicate whether or not a leak has occurred. The device works on the principle of conductivity. In the event of a release into the secondary containment and detection by the monitoring device, the contents in the interstitial space may be removed using a pump through the drop tube in the interstitial space within 24 hours in accordance with facility operating practices. The tank sits on a housekeeping pad on the floor of Solids Handling Building which is sloped slightly to allow for accumulation of liquids at the lowest point in the tank system. The tank system is taken out of service until the primary tank is repaired.

Damage, which affects the integrity of the secondary containment, (e.g. the secondary LLPDE tank shell or wall) is repaired within fifteen (15) days of detection. If permanent repairs cannot be completed within fifteen days of detection, then a notification is submitted to the IDEM for approval for an extension of the repairs. At a minimum, Heritage must perform temporary repairs within 15 days of detection and maintain the temporary repairs until permanent repairs are complete. If temporary repairs cannot be completed within 15 days of detection, the tank system is taken out of service until the repairs are complete.

D-2d(1)(c) **Requirements for External Liner, Vault, Double-Walled Tank or Equivalent Device: 40 CFR 264.193(d)(e), 270.16(g)**

Tank 73 is a double-walled tank and is constructed of LLDPE. Both the primary (inner) and secondary (outer) tanks are constructed of polyethylene which is designed to handle a wide variety of wastes and wastewaters from acids to alkalis. The secondary tank has adequate containment for the primary tank. Hydraulic pressure was not considered as the secondary containment system is above grade.

Leak detection is accomplished by a continuous interstitial monitoring device installed between the inner and outer wall of the double-walled tank that will indicate whether or not a leak has occurred. The device works on the principle of conductivity. In the event of a release into the secondary containment and detection by the monitoring device in the interstitial space of the tank, the contents of the interstitial space is removed within 24 hours in accordance with facility operating practices. The tank system is taken out of service until the inner tank is repaired.

D-2d(1)(d) **Secondary Containment and Leak Detection Requirements for Ancillary**

Equipment: 40 CFR 264.193(f), 270.16(g)

For Tank 73, aboveground piping is visually inspected daily in accordance with the inspection requirements each operating day. The inspection requirements and schedule for inspecting tanks is specified in the Procedure to Prevent Hazards. Pumps and other ancillary equipment are located within the secondary containment structures. Piping is constructed with welded flanges, joints, and connections that are visually inspected each operating day. For Tank 73, the feed pump from the Solids Handling Building trench and sump structure, and the discharge pump from the tank are located in Solids Handling Building, which is designed with secondary containment that includes a wear surface, a primary liner, and a secondary liner.

The outer wall of the tank system is the secondary containment structure for the tank. For all elements of the containment system, the pressure transmitted to the subgrade is less than 2,000 pounds per square foot. Based on the document certified by a professional engineer registered in the State of Indiana, all elements of the containment system have sufficient strength and thickness to prevent failure owing to pressure gradients, climatic conditions, and the stresses of daily operation.

The tanks, the secondary containment system, and the ancillary equipment are inspected each operating day. This practice meets the requirements for leak detection at 40 CFR Part 264.193(b)(3).

D-2(e) **Controls and Practices to Prevent Spills and Overfills: 40 CFR 264.194(a) and (b), 264.195, 270.16(i)**

The compatibilities of the hazardous wastes stored in the tank system are compatible with the contents of the system such that the system will not rupture, leak, corrode, or otherwise fail. Waste being managed in the unit is water from the trench drain system of Solids Handling Building and water from the drip pans installed beneath the filter presses at the facility.

Overfill prevention controls include a level-sensing device and an independent high-level switch that alarms at approximately the 90% level. The maximum set point for level-sensing devices that may be used at the facility is 98% of the tank capacity.

Tank systems are inspected for different items on a daily, weekly, quarterly, and once every five-year schedule to comply with 40 CFR Part 264.195. The items inspected and schedules for inspection are described in Attachment F - Procedures to Prevent Hazards.

Table B-2 Cont'd
Permitted Non-Tank Storage

Storage Areas	Location at Facility	Nominal Physical Dimensions	Storage Capacity	Number of Bays	Part A Process Code	Contents
Containment Building Rail	Containment Buildings Rail	125 X 110 56 X 30	2,411 cubic yds.	NA	S06/T94	Solids with Free Liquids
Containment Building West	Containment Building West	70 X 30 100 X 78 68 X 30	1,198 cubic yds.	NA	S06/T94	Solids with Free Liquids
Subpart X Pugmills (E for 1 pugmill P for 1 pug mill)	Containment Building West and Containment Building Rail – permitted but not constructed	NA	112 cubic yds.	NA	X99 Pugmill	Solids without Free Liquids
Subpart X Filter presses (6 Presses)	Solids Handling Building	NA	399 cubic yards	NA	X99 Filter presses	Solids with Free Liquids

Table B-3
Maximum Permitted Inventory at Closure
Heritage Environmental Services, LLC
Indianapolis, Indiana

Hazardous Waste Management Units	Maximum Inventory at Closure
Total Tank Capacity (Existing)	728,687 gallons
Total Additional Tank Capacity (Proposed)	3,455 gallons
Total Container Storage Area Capacity (Existing)	143,770 gallons
Total Additional Storage Area Capacity (Proposed)	34,550 gallons
Subpart X Pugmill	112 cubic yards
Subpart X Filter presses	399 cubic yards
Total Additional Containment Building –Rail (Existing)	2,411 cubic yards
Total Containment Building-West Capacity (Existing)	1,198 cubic yards

This attachment is submitted as confidential

SUBPART X ASSESSMENT
FILTER PRESS UNITS

Heritage Environmental Services, LLC
7901 West Morris Street
Indianapolis, Indiana

IND 093 219 012