

From: [Valenziano, Beth](#)
To: [Moore, Natalie C](#); [Moulik, Madhurima D](#); [ACKER, JENNY](#)
Cc: [Danesh, Paymon](#); [Painuly, Priyanka](#); [Damico, Genevieve \(she/her/hers\)](#)
Subject: EPA comments re: Covanta Indianapolis title V renewal (#T097-47411-00123)
Date: Tuesday, April 16, 2024 3:41:30 PM

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Hello Talie, Madhurima, and Jenny,

I have reviewed the draft title V permit renewal for Covanta Indianapolis, Inc. (#T097-47411-00123), and I have the following comments. Thank you, and please let me know if you have any questions or would like to discuss further.

1. Under the federal rule applicability section of the TSD, page 6., it states that the source is subject to the Emission Guidelines for Large Municipal Waste Combustors, 40 CFR Part 60, Subpart Cb and 326 IAC 12. Also, section E.1.2 of the draft permit, page 47, identifies the Emission Guidances as the applicable requirement and includes a general reference to 326 IAC 12 and detailed references to Part 60 Subpart Cb. Because Subpart Cb includes emission guidelines for existing sources and not directly applicable New Source Performance Standards, the TSD and the permit should refer to and cite the EPA approved Indiana State Plan in 326 IAC 11-7 as the underlying applicable requirement for these standards. Please revise the permit as necessary to correct and/or supplement the underlying authorities for these requirements, in accordance with 40 CFR 70.6(a)(1)(i). Also note that, because 326 IAC 11-7 incorporates many sections of Subpart Cb by reference (which in turn incorporates sections of Subpart Eb by reference), multiple authority citations may be necessary for each permit condition.

In addition, please clarify in the permit which emissions limits in IAC 11-7-3, 40 CFR 60.33b, 40 CFR 60.34b, and Tables 1 and 3 of 40 CFR Part 60, Subpart Cb that the source is subject to, in accordance with 40 CFR 70.6(a)(1).

Link to the current approved Indiana LMWC State Plan

<https://www.federalregister.gov/documents/2008/10/01/E8-22952/approval-of-revised-municipal-waste-combustor-state-plan-for-designated-facilities-and-pollutants>

Link to all approved Indiana State Plans, including history of Indiana's LMWC State Plan

<https://www.epa.gov/in/indiana-part-60-emission-guidelines-and-part-62-statefederal-plans-section-111d129-delegations>

2. In the federal rule applicability section of the TSD, page 11 states that the municipal solid waste combustion units EU1, EU2, and EU3 are exempt from 40 CFR Part 64 Compliance Assurance Monitoring because they are subject to 40 CFR Part 60, Subpart Cb, i.e., the EPA approved State Plan for Large Municipal Waste Combustors. Although emissions limits required by the State Plan are exempt from CAM, the TSD does not address whether CAM

applies to any other emission limits that these units are subject to. Please review all additional applicable emissions limitations for EU1, EU2, and EU3, in accordance with IDEM's CAM applicability table, to determine possible CAM applicability, and revise the permit if necessary to include any CAM permit content requirements, in accordance with 40 CFR 70.6(a)(1) and 40 CFR 64.6(c).

Beth Valenziano | Air Permits Section
U.S. Environmental Protection Agency Region 5 | Air & Radiation Division
77 W. Jackson Blvd. | Mailcode: AR-18J | Chicago, IL 60604
Phone: 312-886-2703 | valenziano.beth@epa.gov

From: [Moore, Natalie C](#)
To: [Rathbun,Michael](#); [Brian K Foster](#)
Cc: [Peterson,Kimberly](#); [Jason D. Kelly](#); [Paul D Kantola](#)
Subject: RE: Covanta TV Renewal 47411
Date: Tuesday, May 21, 2024 9:41:00 AM
Attachments: [image001.png](#)
[image002.png](#)

Mike,

The requirement is for a range, with 3” as the lower bound and 6” as the upper bound. You’re correct about the reason for the lower bound being to ensure that there is adequate cake on the bags; the upper bound is to ensure that the bags are getting regular shakedown and there isn’t too much cake buildup.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: Rathbun,Michael <MRathbun@reworldwaste.com>
Sent: Monday, May 20, 2024 12:52 PM
To: Moore, Natalie C <NMoore@idem.IN.gov>; Brian K Foster <BFoster@reworldwaste.com>
Cc: Peterson,Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>
Subject: RE: Covanta TV Renewal 47411

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To state it differently, the requirement would be that we not run the baghouses below that 3” mark to ensure that there is adequate cake and/or resistance through the bags to properly remove particulate. Is this understanding accurate?

Thank you.

Mike Rathbun

Facility Manager
LSSGB



Previously known as Covanta

C 973.906.9328

O 317.378.8753

Email: mrathbun@reworldwaste.com

“Speak softly and carry a big stick”

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Sent: Friday, May 17, 2024 4:44 PM

To: Brian K Foster <bfoster@covanta.com>; Rathbun, Michael <MRathbun@covanta.com>

Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: RE: Covanta TV Renewal 47411

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Brian,

As I haven't heard anything from you regarding the pressure drop range, I'm planning to move ahead with the permit using our standard 3 to 6 inches pressure drop range on Tuesday. If you'd like to have an alternative range, please provide information from the baghouse manufacturer before then.

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Cc: Peterson, Kimberly <kpeter@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D

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The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.”

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Ms. Moore,

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Brian,

Can I please get an update on which monitoring requirement Covanta would like? I'd like to finish up addressing the EPA comments and move the permit towards issuance.

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Sent: Wednesday, May 1, 2024 1:48 PM
To: Moore, Natalie C <NMoore@idem.IN.gov>
Subject: Re: Covanta TV Renewal 47411

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Thanks for the heads up.

I'm traveling to a facility we have in Ohio this week.

I think we have a couple of other facilities that have this already so let me ask my peers about this and I'll get back to you shortly.

I know we already monitor pressure drop across the baghouse, but let me get some feedback.

From: Moore, Natalie C <NMoore@idem.IN.gov>
Sent: Tuesday, April 30, 2024 11:16 AM
To: Brian K Foster <bfoster@covanta.com>

Subject: Covanta TV Renewal 47411

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Dear Brian Foster,

We received some comments from the EPA regarding Covanta's draft air permit renewal. One of the comments asked us to take a closer look at compliance assurance monitoring (CAM) applicability for the three mass burn waterwall MSW combustion units. While the CEMS exempt the MSW combustion units from CAM for several pollutants, they are subject to CAM for PM10 and lead. Therefore, we need to add a baghouse monitoring provision to the permit. Would you rather have a pressure drop monitoring requirement or make the continuous opacity monitoring CAM enforceable and add baghouse inspections? Please let me know if you have any questions.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: [Moore, Natalie C](#)
To: [Brian K Foster](#); [Rathbun, Michael](#)
Cc: [Peterson, Kimberly](#); [Jason D. Kelly](#); [Paul D Kantola](#)
Subject: RE: Covanta TV Renewal 47411
Date: Thursday, May 23, 2024 10:55:00 AM
Attachments: [image001.png](#)
[image002.png](#)

Brian,

The requirement is to only check the pressure differential once per day, so that means an instantaneous value. We've changed the upper bound on the pressure drop range to 10 inches. Since the EPA looked at it, we want to be cautious about not approving an unacceptable range. Also, the monitoring condition does not state that a pressure differential reading outside the approved range is a deviation from the permit – it means you need to check the bags and verify that they're operating correctly, and fix them if they're not (see Section C – Response to Excursions and Exceedances). We're placing the renewal on 15 day EPA review and then planning to proceed with issuance.

Please feel free to contact me if you have any questions.

Sincerely,

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: Brian K Foster <BFoster@reworldwaste.com>
Sent: Tuesday, May 21, 2024 10:43 AM
To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun, Michael <MRathbun@reworldwaste.com>
Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>
Subject: Re: Covanta TV Renewal 47411

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Ms Moore,

We've gone through the data for that last several years of stack testing and here are the DP

values during the PM/Metals runs.

As you can see, the 3" and 6" range is not even in the ballpark of where we run at while demonstrating compliance with stack testing parameters. Even a total range of 3" is not reasonable.

Are we also looking at an instantaneous value for compliance or are we looking at an averaging period like 1-hr or more?

From: Moore, Natalie C <NMoore@idem.IN.gov>
Sent: Tuesday, May 21, 2024 9:41 AM
To: Rathbun,Michael <MRathbun@reworldwaste.com>; Brian K Foster <BFoster@reworldwaste.com>
Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>
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To: Moore, Natalie C <NMoore@idem.IN.gov>; Brian K Foster <BFoster@reworldwaste.com>

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Facility Manager

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Dear Brian Foster,

We received some comments from the EPA regarding Covanta's draft air permit renewal. One of the comments asked us to take a closer look at compliance assurance monitoring (CAM) applicability for the three mass burn waterwall MSW combustion units. While the CEMS exempt the MSW combustion units from CAM for several pollutants, they are subject to CAM for PM10 and lead. Therefore, we need to add a baghouse monitoring provision to the permit. Would you rather have a pressure drop monitoring requirement or make the continuous opacity monitoring CAM enforceable and add baghouse inspections? Please let me know if you have any questions.

-Talie

Talie Moore

Senior Environmental Manager

Permits Branch, Office of Air Quality

Phone: (317) 233-8279

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From: [Brian K Foster](#)
To: [Moore, Natalie C](#)
Subject: Re: Covanta TV Renewal 47411
Date: Thursday, May 30, 2024 1:36:14 PM
Attachments: [image001.png](#)
[image002.png](#)

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I'm checking right now...he is in a call right now.

I will keep pinging him...I can be pain for sure.

From: Moore, Natalie C <NMoore@idem.IN.gov>
Sent: Thursday, May 30, 2024 1:34 PM
To: Brian K Foster <BFoster@reworldwaste.com>; Rathbun,Michael <MRathbun@reworldwaste.com>
Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>
Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Brian,

Since I am hoping to finalize a range so that we can move forward with the permit, it would probably be a good idea to include him in the call. When is Michael available?

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: Brian K Foster <BFoster@reworldwaste.com>
Sent: Thursday, May 30, 2024 1:33 PM
To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@reworldwaste.com>
Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: Re: Covanta TV Renewal 47411

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My number is 317-225-6357.

I'm good now but if you would like we could do a Teams call with Michael, the facility manager.

We can talk big picture but I'd like to rope him in specifically before we finalize a range.

Your choice.

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Thursday, May 30, 2024 1:28 PM

To: Brian K Foster <BFoster@reworldwaste.com>; Rathbun,Michael <MRathbun@reworldwaste.com>

Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution. ***

Brian,

Can I have your phone number, please? I'd like to call you to discuss the pressure drop range. When would be a good time?

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

Interested in pollution prevention opportunities? Start [here](#).

IDEM values your feedback.

Please take two minutes and complete this brief survey.



From: Brian K Foster <BFoster@reworldwaste.com>

Sent: Thursday, May 23, 2024 2:16 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@reworldwaste.com>

Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly

<JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: Re: Covanta TV Renewal 47411

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So if I read this right, the permit will be written with a 3" - 10" range that we will only be in for roughly 1/3 of the time.

If we encounter a reading outside of the 3" - 10" range during a once-a-day inspection (do we call this an excursion?)

We then conduct baghouse inspections to verify the proper operation of the bags.

If there are issues we correct them but if the bags are working properly then we just make a note of it?

I'm a little concerned about setting up a permit criteria that will result in 300 excursions a year?

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Thursday, May 23, 2024 10:55 AM

To: Brian K Foster <BFoster@reworldwaste.com>; Rathbun, Michael <MRathbun@reworldwaste.com>

Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution. ***

Brian,

The requirement is to only check the pressure differential once per day, so that means an instantaneous value. We've changed the upper bound on the pressure drop range to 10 inches. Since the EPA looked at it, we want to be cautious about not approving an unacceptable range. Also, the monitoring condition does not state that a pressure differential reading outside the approved range is a deviation from the permit – it means you need to check the bags and verify that they're operating correctly, and fix them if they're not (see Section C – Response to Excursions and Exceedances). We're placing the renewal on 15 day EPA review and then planning to proceed with issuance.

Please feel free to contact me if you have any questions.

Sincerely,

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

Interested in pollution prevention opportunities? Start [here](#).

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Please take two minutes and complete this brief survey.



From: Brian K Foster <BFoster@reworldwaste.com>
Sent: Tuesday, May 21, 2024 10:43 AM
To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@reworldwaste.com>
Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>
Subject: Re: Covanta TV Renewal 47411

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Ms Moore,

We've gone through the data for that last several years of stack testing and here are the DP values during the PM/Metals runs.

As you can see, the 3" and 6" range is not even in the ballpark of where we run at while demonstrating compliance with stack testing parameters. Even a total range of 3" is not reasonable.

Are we also looking at an instantaneous value for compliance or are we looking at an averaging period like 1-hr or more?

From: Moore, Natalie C <NMoore@idem.IN.gov>
Sent: Tuesday, May 21, 2024 9:41 AM
To: Rathbun,Michael <MRathbun@reworldwaste.com>; Brian K Foster <BFoster@reworldwaste.com>
Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>
Subject: RE: Covanta TV Renewal 47411

***** Warning: External message - exercise caution.*****

Mike,

The requirement is for a range, with 3" as the lower bound and 6" as the upper bound. You're

correct about the reason for the lower bound being to ensure that there is adequate cake on the bags; the upper bound is to ensure that the bags are getting regular shakedowns and there isn't too much cake buildup.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: Rathbun, Michael <MRathbun@reworldwaste.com>

Sent: Monday, May 20, 2024 12:52 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>; Brian K Foster <BFoster@reworldwaste.com>

Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: RE: Covanta TV Renewal 47411

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Natalie, assuming that we are talking about a lower DP limit for the baghouses, 3" makes sense for us. There was some confusion that the requirement would be that the facility runs between 3" (a lower limit) and 6" (a higher limit) dp all of the time.

To state it differently, the requirement would be that we not run the baghouses below that 3" mark to ensure that there is adequate cake and/or resistance through the bags to properly remove particulate. Is this understanding accurate?

Thank you.

Mike Rathbun

Facility Manager
LSSGB

Reworld™
.....

Previously known as Covanta

C 973.906.9328

O 317.378.8753

Email: mrathbun@reworldwaste.com

“Speak softly and carry a big stick”

From: Moore, Natalie C <NMoore@idem.IN.gov>
Sent: Friday, May 17, 2024 4:44 PM
To: Brian K Foster <bfoster@covanta.com>; Rathbun,Michael <MRathbun@covanta.com>
Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>
Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution. ***

Brian,

As I haven't heard anything from you regarding the pressure drop range, I'm planning to move ahead with the permit using our standard 3 to 6 inches pressure drop range on Tuesday. If you'd like to have an alternative range, please provide information from the baghouse manufacturer before then.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: Brian K Foster <BFoster@covanta.com>
Sent: Friday, May 10, 2024 3:51 PM
To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@covanta.com>
Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>
Subject: Re: Covanta TV Renewal 47411

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Natalie, we're OK with the pressure drop concept being added to the permit. We're going to go back to the stack testing data and come up with what we normally run with. After discussions with facility manager, Even with brand new bags we don't go below 6 inches of water. We just want to make sure that the range that's mentioned in the permit is reasonable. We should have some data for you on Monday or Tuesday of next week.

Get [Outlook for iOS](#)

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Friday, May 10, 2024 2:39:27 PM

To: Brian K Foster <bfoster@covanta.com>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson,Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Mr. Foster,

Shall I go ahead and add the pressure drop monitoring to the permit?

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: Moore, Natalie C

Sent: Thursday, May 9, 2024 3:32 PM

To: Brian K Foster <BFoster@covanta.com>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson,Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: RE: Covanta TV Renewal 47411

Yes, exactly. It would read,

“The Permittee shall record the pressure drop across the baghouses used in conjunction with the three (3) MSW combustion units, at least once per day when the MSW combustion units are each in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.”

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: Brian K Foster <BFoster@covanta.com>

Sent: Thursday, May 9, 2024 1:11 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: Re: Covanta TV Renewal 47411

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So we would be looking at a minimum and max value?

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Thursday, May 9, 2024 1:09 PM

To: Brian K Foster <bfoster@covanta.com>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: RE: Covanta TV Renewal 47411

***** Warning: External message - exercise caution.*****

Mr. Foster,

Usually we use a pressure drop range between 3.0 and 6.0 inches of water, with an allowance in the condition for using different bounding values as determined during the most recent stack test.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: Brian K Foster <BFoster@covanta.com>

Sent: Thursday, May 9, 2024 1:05 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: Re: Covanta TV Renewal 47411

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Ms. Moore,

Sorry for the delay.

The feedback I've gotten from the facility definitely leans toward the pressure drop monitoring.

Do you have any idea what the limits might be or should we provide historical data from our facility for context?

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Thursday, May 9, 2024 1:02 PM

To: Brian K Foster <bfoster@covanta.com>

Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Brian,

Can I please get an update on which monitoring requirement Covanta would like? I'd like to finish up addressing the EPA comments and move the permit towards issuance.

Thanks,

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: Brian K Foster <BFoster@covanta.com>

Sent: Wednesday, May 1, 2024 1:48 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>

Subject: Re: Covanta TV Renewal 47411

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Thanks for the heads up.

I'm traveling to a facility we have in Ohio this week.

I think we have a couple of other facilities that have this already so let me ask my peers about this and I'll get back to you shortly.

I know we already monitor pressure drop across the baghouse, but let me get some feedback.

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Tuesday, April 30, 2024 11:16 AM

To: Brian K Foster <bfoster@covanta.com>

Subject: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Dear Brian Foster,

We received some comments from the EPA regarding Covanta's draft air permit renewal. One of the comments asked us to take a closer look at compliance assurance monitoring (CAM) applicability for the three mass burn waterwall MSW combustion units. While the CEMS exempt the MSW combustion units from CAM for several pollutants, they are subject to CAM for PM10 and lead. Therefore, we need to add a baghouse monitoring provision to the permit. Would you rather have a pressure drop monitoring requirement or make the continuous opacity monitoring CAM enforceable and add baghouse inspections? Please let me know if you have any questions.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: [Brian K Foster](#)
To: [Moore, Natalie C](#)
Cc: [Rathbun, Michael](#)
Subject: Re: Covanta TV Renewal 47411
Date: Monday, June 3, 2024 11:14:57 AM
Attachments: [image001.png](#)
[image002.png](#)

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Natalie,

Please see the below the source contact

Michael Rathbun
Reworld Indianapolis, Inc
2320 South Harding St.
Indianapolis, IN 46221

O 317.378.8753

Email: mrathbun@reworldwaste.com

From: Moore, Natalie C <NMoore@idem.IN.gov>
Sent: Monday, June 3, 2024 10:12 AM
To: Brian K Foster <BFoster@reworldwaste.com>
Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Brian,

Can I please have the name, phone number, and mailing address of the new source contact?

Thanks,

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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Please take two minutes and complete this brief survey.



From: Brian K Foster <BFoster@reworldwaste.com>
Sent: Thursday, May 30, 2024 1:36 PM
To: Moore, Natalie C <NMoore@idem.IN.gov>
Subject: Re: Covanta TV Renewal 47411

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I'm checking right now...he is in a call right now.

I will keep pinging him...I can be pain for sure.

From: Moore, Natalie C <NMoore@idem.IN.gov>
Sent: Thursday, May 30, 2024 1:34 PM
To: Brian K Foster <BFoster@reworldwaste.com>; Rathbun,Michael <MRathbun@reworldwaste.com>
Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>
Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Brian,

Since I am hoping to finalize a range so that we can move forward with the permit, it would probably be a good idea to include him in the call. When is Michael available?

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

Interested in pollution prevention opportunities? Start [here](#).

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From: Brian K Foster <BFoster@reworldwaste.com>
Sent: Thursday, May 30, 2024 1:33 PM
To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@reworldwaste.com>
Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: Re: Covanta TV Renewal 47411

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My number is 317-225-6357.

I'm good now but if you would like we could do a Teams call with Michael, the facility manager.

We can talk big picture but I'd like to rope him in specifically before we finalize a range.

Your choice.

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Thursday, May 30, 2024 1:28 PM

To: Brian K Foster <BFoster@reworldwaste.com>; Rathbun,Michael <MRathbun@reworldwaste.com>

Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution. ***

Brian,

Can I have your phone number, please? I'd like to call you to discuss the pressure drop range. When would be a good time?

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

Interested in pollution prevention opportunities? Start [here](#).

IDEM values your feedback.

Please take two minutes and complete this brief survey.



From: Brian K Foster <BFoster@reworldwaste.com>

Sent: Thursday, May 23, 2024 2:16 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@reworldwaste.com>

Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly

<JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: Re: Covanta TV Renewal 47411

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So if I read this right, the permit will be written with a 3" - 10" range that we will only be in for roughly 1/3 of the time.

If we encounter a reading outside of the 3" - 10" range during a once-a-day inspection (do we call this an excursion?)

We then conduct baghouse inspections to verify the proper operation of the bags.

If there are issues we correct them but if the bags are working properly then we just make a note of it?

I'm a little concerned about setting up a permit criteria that will result in 300 excursions a year?

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Thursday, May 23, 2024 10:55 AM

To: Brian K Foster <BFoster@reworldwaste.com>; Rathbun, Michael <MRathbun@reworldwaste.com>

Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution. ***

Brian,

The requirement is to only check the pressure differential once per day, so that means an instantaneous value. We've changed the upper bound on the pressure drop range to 10 inches. Since the EPA looked at it, we want to be cautious about not approving an unacceptable range. Also, the monitoring condition does not state that a pressure differential reading outside the approved range is a deviation from the permit – it means you need to check the bags and verify that they're operating correctly, and fix them if they're not (see Section C – Response to Excursions and Exceedances). We're placing the renewal on 15 day EPA review and then planning to proceed with issuance.

Please feel free to contact me if you have any questions.

Sincerely,

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

Interested in pollution prevention opportunities? Start [here](#).

IDEM values your feedback.

Please take two minutes and complete this brief survey.



From: Brian K Foster <BFoster@reworldwaste.com>
Sent: Tuesday, May 21, 2024 10:43 AM
To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@reworldwaste.com>
Cc: Peterson, Kimberly <kpeter@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>
Subject: Re: Covanta TV Renewal 47411

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Ms Moore,

We've gone through the data for that last several years of stack testing and here are the DP values during the PM/Metals runs.

As you can see, the 3" and 6" range is not even in the ballpark of where we run at while demonstrating compliance with stack testing parameters. Even a total range of 3" is not reasonable.

Are we also looking at an instantaneous value for compliance or are we looking at an averaging period like 1-hr or more?

From: Moore, Natalie C <NMoore@idem.IN.gov>
Sent: Tuesday, May 21, 2024 9:41 AM
To: Rathbun,Michael <MRathbun@reworldwaste.com>; Brian K Foster <BFoster@reworldwaste.com>
Cc: Peterson, Kimberly <kpeter@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>
Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Mike,

The requirement is for a range, with 3" as the lower bound and 6" as the upper bound. You're

correct about the reason for the lower bound being to ensure that there is adequate cake on the bags; the upper bound is to ensure that the bags are getting regular shakedowns and there isn't too much cake buildup.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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Please take two minutes and complete this brief survey.



From: Rathbun, Michael <MRathbun@reworldwaste.com>

Sent: Monday, May 20, 2024 12:52 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>; Brian K Foster <BFoster@reworldwaste.com>

Cc: Peterson, Kimberly <kpeterson@reworldwaste.com>; Jason D. Kelly <JKelly2@reworldwaste.com>; Paul D Kantola <PKantola@reworldwaste.com>

Subject: RE: Covanta TV Renewal 47411

****** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ******

Natalie, assuming that we are talking about a lower DP limit for the baghouses, 3" makes sense for us. There was some confusion that the requirement would be that the facility runs between 3" (a lower limit) and 6" (a higher limit) dp all of the time.

To state it differently, the requirement would be that we not run the baghouses below that 3" mark to ensure that there is adequate cake and/or resistance through the bags to properly remove particulate. Is this understanding accurate?

Thank you.

Mike Rathbun

Facility Manager
LSSGB

Reworld™
.....

Previously known as Covanta

C 973.906.9328

O 317.378.8753

Email: mrathbun@reworldwaste.com

“Speak softly and carry a big stick”

From: Moore, Natalie C <NMoore@idem.IN.gov>
Sent: Friday, May 17, 2024 4:44 PM
To: Brian K Foster <bfoster@covanta.com>; Rathbun, Michael <MRathbun@covanta.com>
Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>
Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution. ***

Brian,

As I haven't heard anything from you regarding the pressure drop range, I'm planning to move ahead with the permit using our standard 3 to 6 inches pressure drop range on Tuesday. If you'd like to have an alternative range, please provide information from the baghouse manufacturer before then.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

Interested in pollution prevention opportunities? Start [here](#).

IDEM values your feedback.

Please take two minutes and complete this brief survey.



From: Brian K Foster <BFoster@covanta.com>
Sent: Friday, May 10, 2024 3:51 PM
To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun, Michael <MRathbun@covanta.com>
Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>
Subject: Re: Covanta TV Renewal 47411

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Natalie, we're OK with the pressure drop concept being added to the permit. We're going to go back to the stack testing data and come up with what we normally run with. After discussions with facility manager, Even with brand new bags we don't go below 6 inches of water. We just want to make sure that the range that's mentioned in the permit is reasonable. We should have some data for you on Monday or Tuesday of next week.

Get [Outlook for iOS](#)

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Friday, May 10, 2024 2:39:27 PM

To: Brian K Foster <bfoster@covanta.com>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson,Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Mr. Foster,

Shall I go ahead and add the pressure drop monitoring to the permit?

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

Interested in pollution prevention opportunities? Start [here](#).

IDEM values your feedback.

Please take two minutes and complete this brief survey.



From: Moore, Natalie C

Sent: Thursday, May 9, 2024 3:32 PM

To: Brian K Foster <BFoster@covanta.com>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson,Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: RE: Covanta TV Renewal 47411

Yes, exactly. It would read,

“The Permittee shall record the pressure drop across the baghouses used in conjunction with the three (3) MSW combustion units, at least once per day when the MSW combustion units are each in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.”

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

Interested in pollution prevention opportunities? Start [here](#).

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Please take two minutes and complete this brief survey.



From: Brian K Foster <BFoster@covanta.com>

Sent: Thursday, May 9, 2024 1:11 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: Re: Covanta TV Renewal 47411

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So we would be looking at a minimum and max value?

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Thursday, May 9, 2024 1:09 PM

To: Brian K Foster <bfoster@covanta.com>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: RE: Covanta TV Renewal 47411

***** Warning: External message - exercise caution.*****

Mr. Foster,

Usually we use a pressure drop range between 3.0 and 6.0 inches of water, with an allowance in the condition for using different bounding values as determined during the most recent stack test.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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IDEM values your feedback.

Please take two minutes and complete this brief survey.



From: Brian K Foster <BFoster@covanta.com>

Sent: Thursday, May 9, 2024 1:05 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>; Rathbun,Michael <MRathbun@covanta.com>

Cc: Peterson, Kimberly <kpeterson@covanta.com>; Jason D. Kelly <JKelly2@covanta.com>; Paul D Kantola <PKantola@covanta.com>

Subject: Re: Covanta TV Renewal 47411

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Ms. Moore,

Sorry for the delay.

The feedback I've gotten from the facility definitely leans toward the pressure drop monitoring.

Do you have any idea what the limits might be or should we provide historical data from our facility for context?

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Thursday, May 9, 2024 1:02 PM

To: Brian K Foster <bfoster@covanta.com>

Subject: RE: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Brian,

Can I please get an update on which monitoring requirement Covanta would like? I'd like to finish up addressing the EPA comments and move the permit towards issuance.

Thanks,

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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Please take two minutes and complete this brief survey.



From: Brian K Foster <BFoster@covanta.com>

Sent: Wednesday, May 1, 2024 1:48 PM

To: Moore, Natalie C <NMoore@idem.IN.gov>

Subject: Re: Covanta TV Renewal 47411

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Thanks for the heads up.

I'm traveling to a facility we have in Ohio this week.

I think we have a couple of other facilities that have this already so let me ask my peers about this and I'll get back to you shortly.

I know we already monitor pressure drop across the baghouse, but let me get some feedback.

From: Moore, Natalie C <NMoore@idem.IN.gov>

Sent: Tuesday, April 30, 2024 11:16 AM

To: Brian K Foster <bfoster@covanta.com>

Subject: Covanta TV Renewal 47411

*** Warning: External message - exercise caution.***

Dear Brian Foster,

We received some comments from the EPA regarding Covanta's draft air permit renewal. One of the comments asked us to take a closer look at compliance assurance monitoring (CAM) applicability for the three mass burn waterwall MSW combustion units. While the CEMS exempt the MSW combustion units from CAM for several pollutants, they are subject to CAM for PM10 and lead. Therefore, we need to add a baghouse monitoring provision to the permit. Would you rather have a pressure drop monitoring requirement or make the continuous opacity monitoring CAM enforceable and add baghouse inspections? Please let me know if you have any questions.

-Talie

Talie Moore
Senior Environmental Manager
Permits Branch, Office of Air Quality
Phone: (317) 233-8279

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From: [Brian K Foster](#)
To: [Rathbun,Michael](#)
Cc: [Moore, Natalie C](#)
Subject: Covanta Name change e-mail to IDEM
Date: Thursday, June 20, 2024 4:23:00 PM
Attachments: [Outlook-5b200aqi.png](#)
[2024 Reworld surety bond name change document.pdf](#)

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Mike, can you respond back to IDEM on how you want the name on the permit to read, i.e. "Reworld Indianapolis, Inc."

I've attached the Surety Bond Rider and it's name change as well.

Natalie, Mike's number is 371.378.8753

[Brian Foster](#)

Regional Area Manager - Midwest



Previously known as Covanta

C 317-225-6357

bfoster@reworldwaste.com

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GENERAL SURETY RIDER

To be attached and form a part of

Bond No. SUR0007796
For Closure Bond for FPP 49-13, Indianapolis Resource Recovery Facility Marion County Indiana
Dated effective 10/08/2009 (MONTH, DAY, YEAR)
Executed by Covanta Indianapolis, Inc., as Principal, (PRINCIPAL)
And by Argonaut Insurance Company, as Surety, (SURETY)
And in favor of Department of Environmental Management, State of Indiana (OBLIGEE)

In consideration of the mutual agreements herein contained the Principal and the Surety hereby consent to changing

INFORMATION	FROM	TO
Principal Name	Covanta Indianapolis, Inc.	Reworld Indianapolis, Inc.

Nothing herein contained shall vary, alter or extend any provision or condition of this bond except as herein expressly stated.

This rider is effective

10/08/2023

(MONTH, DAY, YEAR)

Signed and Sealed

05/30/2024

(MONTH, DAY, YEAR)



BY James K. [Signature] Reworld Indianapolis, Inc.
PRINCIPAL
VP Risk Management
TITLE

BY [Signature] Argonaut Insurance Company
SURETY
William T. Krumm, ATTORNEY-IN-FACT

Argonaut Insurance Company
Deliveries Only: 225 W. Washington, 24th Floor
Chicago, IL 60606

United States Postal Service: P.O. Box 469011, San Antonio, TX 78246
POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That the Argonaut Insurance Company, a Corporation duly organized and existing under the laws of the State of Illinois and having its principal office in the County of Cook, Illinois does hereby nominate, constitute and appoint: **William T. Krumm**

Surety Bond No.: SUR0007796
Principal: Reworld Indianapolis, Inc.
Obligee: Department of Environmental Management, State of Indiana

Their true and lawful agent(s) and attorney(s)-in-fact, each in their separate capacity if more than one is named above, to make, execute, seal and deliver for and on its behalf as surety, and as its act and deed any and all bonds, contracts, agreements of indemnity and other undertakings in suretyship provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed the sum of:

\$97,550,000.00


This Power of Attorney is granted and is signed and sealed under and by the authority of the following Resolution adopted by the Board of Directors of Argonaut Insurance Company:

"RESOLVED, That the President, Senior Vice President, Vice President, Assistant Vice President, Secretary, Treasurer and each of them hereby is authorized to execute powers of attorney, and such authority can be executed by use of facsimile signature, which may be attested or acknowledged by any officer or attorney, of the Company, qualifying the attorney or attorneys named in the given power of attorney, to execute in behalf of, and acknowledge as the act and deed of the Argonaut Insurance Company, all bond undertakings and contracts of suretyship, and to affix the corporate seal thereto."

IN WITNESS WHEREOF, Argonaut Insurance Company has caused its official seal to be hereunto affixed and these presents to be signed by its duly authorized officer on the 19th day of November, 2021.

Argonaut Insurance Company



by: 

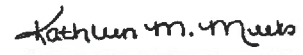
Gary E. Grose, President

STATE OF TEXAS
COUNTY OF HARRIS SS:

On this 19th day of November, 2021 A.D., before me, a Notary Public of the State of Texas, in and for the County of Harris, duly commissioned and qualified, came THE ABOVE OFFICER OF THE COMPANY, to me personally known to be the individual and officer described in, and who executed the preceding instrument, and he acknowledged the execution of same, and being by me duly sworn, deposed and said that he is the officer of the said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said corporation, and that Resolution adopted by the Board of Directors of said Company, referred to in the preceding instrument is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand, and affixed my Official Seal at the County of Harris, the day and year first above written.





(Notary Public)

I, the undersigned Officer of the Argonaut Insurance Company, Illinois Corporation, do hereby certify that the original POWER OF ATTORNEY of which the foregoing is a full, true and correct copy is still in full force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand, and affixed the Seal of said Company, on the 30th day of May, 2024.



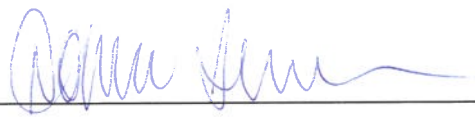

Austin W. King, Secretary

State of Illinois }
County of Cook } ss:

On this 30th day May in the year two thousand twenty four, before me, Donna Irigoyen, a Notary Public in and for said County and State, residing therein, duly commissioned and sworn, personally appeared William T Krumm known to me to be the duly authorized Attorney-in-fact of the Argonaut Insurance Company and the same person whose name is subscribed to the within instrument as the Attorney-in-fact of said Company and that she duly acknowledged to me that he subscribed the name of the Argonaut Insurance Company and thereto as Surety and his own name as Attorney-in-fact.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this Certificate first above written.

7/13/2025



Notary Public in and for
City, State of

Donna Irigoyen

Rolling Meadows, Illinois



From: [Rathbun,Michael](#)
To: [Brian K Foster](#)
Cc: [Moore, Natalie C](#)
Subject: RE: Covanta Name change e-mail to IDEM
Date: Tuesday, June 25, 2024 1:43:23 PM
Attachments: [image001.png](#)
[image002.png](#)
[2024 Reworld surety bond name change document.pdf](#)

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Good Afternoon Natalie, I would like to confirm that we want the name our permit to read, "Reworld Indianapolis, Inc."

Thank You.

Mike Rathbun
Facility Manager
LSSGB



Previously known as Covanta

C 973.906.9328
O 317.378.8753
Email: mrathbun@reworldwaste.com
"Speak softly and carry a big stick"

From: Brian K Foster <BFoster@reworldwaste.com>
Sent: Thursday, June 20, 2024 4:22 PM
To: Rathbun,Michael <MRathbun@reworldwaste.com>
Cc: Moore, Natalie C <NMoore@idem.IN.gov>
Subject: Covanta Name change e-mail to IDEM

Mike, can you respond back to IDEM on how you want the name on the permit to read, i.e. "Reworld Indianapolis, Inc."

I've attached the Surety Bond Rider and it's name change as well.

Natalie, Mike's number is 371.378.8753

Brian Foster

Regional Area Manager - Midwest



Previously known as Covanta

C 317-225-6357

bfoster@reworldwaste.com

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GENERAL SURETY RIDER

To be attached and form a part of

Bond No. SUR0007796
For Closure Bond for FPP 49-13, Indianapolis Resource Recovery Facility Marion County Indiana
Dated effective 10/08/2009 (MONTH, DAY, YEAR)
Executed by Covanta Indianapolis, Inc., as Principal, (PRINCIPAL)
And by Argonaut Insurance Company , as Surety, (SURETY)
And in favor of Department of Environmental Management, State of Indiana (OBLIGEE)

In consideration of the mutual agreements herein contained the Principal and the Surety hereby consent to changing

INFORMATION	FROM	TO
Principal Name	Covanta Indianapolis, Inc.	Reworld Indianapolis, Inc.

Nothing herein contained shall vary, alter or extend any provision or condition of this bond except as herein expressly stated.

This rider is effective

10/08/2023

(MONTH, DAY, YEAR)

Signed and Sealed

05/30/2024

(MONTH, DAY, YEAR)



BY James K. [Signature] Reworld Indianapolis, Inc.
VP Risk Management PRINCIPAL
TITLE

BY William T. Krumm [Signature] Argonaut Insurance Company
SURETY

William T. Krumm, ATTORNEY-IN-FACT

Argonaut Insurance Company
Deliveries Only: 225 W. Washington, 24th Floor
Chicago, IL 60606

United States Postal Service: P.O. Box 469011, San Antonio, TX 78246
POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That the Argonaut Insurance Company, a Corporation duly organized and existing under the laws of the State of Illinois and having its principal office in the County of Cook, Illinois does hereby nominate, constitute and appoint: **William T. Krumm**

Surety Bond No.: SUR0007796
Principal: Reworld Indianapolis, Inc.
Obligee: Department of Environmental Management, State of Indiana

Their true and lawful agent(s) and attorney(s)-in-fact, each in their separate capacity if more than one is named above, to make, execute, seal and deliver for and on its behalf as surety, and as its act and deed any and all bonds, contracts, agreements of indemnity and other undertakings in suretyship provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed the sum of:

\$97,550,000.00


This Power of Attorney is granted and is signed and sealed under and by the authority of the following Resolution adopted by the Board of Directors of Argonaut Insurance Company:

"RESOLVED, That the President, Senior Vice President, Vice President, Assistant Vice President, Secretary, Treasurer and each of them hereby is authorized to execute powers of attorney, and such authority can be executed by use of facsimile signature, which may be attested or acknowledged by any officer or attorney, of the Company, qualifying the attorney or attorneys named in the given power of attorney, to execute in behalf of, and acknowledge as the act and deed of the Argonaut Insurance Company, all bond undertakings and contracts of suretyship, and to affix the corporate seal thereto."

IN WITNESS WHEREOF, Argonaut Insurance Company has caused its official seal to be hereunto affixed and these presents to be signed by its duly authorized officer on the 19th day of November, 2021.

Argonaut Insurance Company



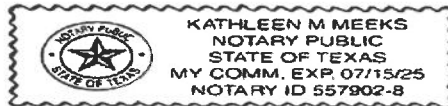
by: 

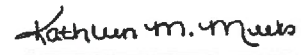
Gary E. Grose, President

STATE OF TEXAS
COUNTY OF HARRIS SS:

On this 19th day of November, 2021 A.D., before me, a Notary Public of the State of Texas, in and for the County of Harris, duly commissioned and qualified, came THE ABOVE OFFICER OF THE COMPANY, to me personally known to be the individual and officer described in, and who executed the preceding instrument, and he acknowledged the execution of same, and being by me duly sworn, deposed and said that he is the officer of the said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said corporation, and that Resolution adopted by the Board of Directors of said Company, referred to in the preceding instrument is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand, and affixed my Official Seal at the County of Harris, the day and year first above written.





(Notary Public)

I, the undersigned Officer of the Argonaut Insurance Company, Illinois Corporation, do hereby certify that the original POWER OF ATTORNEY of which the foregoing is a full, true and correct copy is still in full force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand, and affixed the Seal of said Company, on the 30th day of May, 2024.



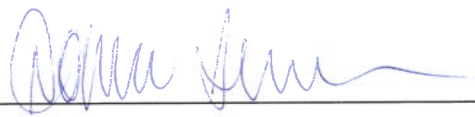

Austin W. King, Secretary

State of Illinois }
County of Cook } ss:

On this 30th day May in the year two thousand twenty four, before me, Donna Irigoyen, a Notary Public in and for said County and State, residing therein, duly commissioned and sworn, personally appeared William T Krumm known to me to be the duly authorized Attorney-in-fact of the Argonaut Insurance Company and the same person whose name is subscribed to the within instrument as the Attorney-in-fact of said Company and that she duly acknowledged to me that he subscribed the name of the Argonaut Insurance Company and thereto as Surety and his own name as Attorney-in-fact.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this Certificate first above written.

7/13/2025



Notary Public in and for
City, State of

Donna Irigoyen

Rolling Meadows, Illinois



BILLING WORKSHEET

TV Permits

For Applications Received On and After October 1, 2019

Permit #: T097-47411-00123
 Permit Reviewer: Talie Moore
 Application Received Date: 1/11/2024

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary) and check the appropriate box or fill in the number of reviews. The total fee will be calculated at the bottom and transferred to the billing amount on the first page. Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

TV Fees			
<input type="checkbox"/>		\$793	TV MSM (45)
<input type="checkbox"/>		\$5,556	TV NSC (Minor PSD/EO) (120)
<input type="checkbox"/>		\$9,525	TV NSC (Major PSD/EO) (270)
<input type="checkbox"/>		\$5,556	TV SSM (Minor PSD/EO) (120)
<input type="checkbox"/>		\$9,525	TV SSM (Major PSD/EO) (270)
<i>Note: See "Transition scenarios - permits and fees" document located in SharePoint for more information on handling transition permits and associated fees.</i>			

NSPS / NESHAP / 326 IAC 8-1-6 BACT / 326 IAC 2-4.1 MACT Review			
Number of Reviews	Total Fee	Fee	See "NSPS-NESHAP-BACT Billing Info" document for instructions
<input type="checkbox"/>		\$793	for each review for an applicable NSPS
<input type="checkbox"/>		\$793	for each review for an applicable NESHAP
<input type="checkbox"/>		\$952	times each 326 IAC 8-1-6 BACT and each 326 IAC 2-4.1 MACT
<i>For each best available control technology (BACT) analysis for VOC under 326 IAC 8-1-6 and for each maximum achievable control technology (MACT) under 326 IAC 2-4.1. [326 IAC 2-1.1-7(m)(5)]</i>			

Other Fees			
<input type="checkbox"/>		\$793	Interim – Any type
<input type="checkbox"/>		\$793	Public Hearing

PSD BACT or LAER Review			
<input type="checkbox"/>		\$4,762	2 to 5 Review Analyses
<input type="checkbox"/>		\$9,525	6 to 10 Review Analyses
<input type="checkbox"/>		\$15,875	11 or more Review Analyses
<i>Fees for BACT under 326 IAC 2-2-3 or LAER under 326 IAC 2-3-3 are per pollutant and per emissions unit or group of identical emissions units for which a control technology analysis is required. [326 IAC 2-1.1-7(m)(2)]</i>			

Air Quality Impact Study Review			
Number of Pollutants	Total Fee	Fee	
<input type="checkbox"/>		\$9,525	per pollutant if OAQ does the analysis
<input type="checkbox"/>		\$5,556	if applicant does the analysis (not dependent on number of pollutants)

Plantwide Applicability Limitation (PAL)		
PAL Pollutants (tons/year)	Total Fee	<i>Instructions: enter total allowable tons under all PALs in the permit - fee, including max fee, will calculate automatically.</i>
		PAL: separate fee per PAL pollutant. \$63 per ton of allowable emissions Maximum Combined fee for all PAL pollutants not to exceed \$63,500

 \$0 **Total Applicable Fee**

OAQ Permits Branch Invoice Worksheet

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary). Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Source Name: Covanta Indianapolis, Inc.

TEMPO AI: 12552

Permit #: T097-47411-00123

CST #:

Credit for permit fees: \$

Credit Received Date:

Note: IDEM's accounting office requires that fee bills or refunds, be sent to the accounts Department at the billing address listed on application. If a courtesy copy is needed, please indicate at the bottom of this page.

Permit Reviewer please indicate applicable fees on page #2. Total will carry over to this page.

Total Due: \$ \$0

Total Credit: \$ \$0

Total Permitting Fees Applicable: \$ \$0

Total Refund Due: \$

Reason for Refund:

Adjustments to Applicable Fees: \$

Explanation of adjustments:

A courtesy copy of the billing has been requested by the applicant, please send to:

Name/Title:

Address:

Permit Reviewer: Talie Moore

Date: 2/6/2024

**BILLING WORKSHEET
FESOP Permits**

For Applications Received On and After October 1, 2019

Permit #: _____
 Permit Reviewer: _____
 Application Received Date: _____

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary) and check the appropriate box or fill in the number of reviews. The total fee will be calculated at the bottom and transferred to the billing amount on the first page. Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

FESOP Fees			
<input type="checkbox"/>		\$793	FESOP Min Permit Revision (45)
<input type="checkbox"/>		\$793	FESOP Renewal / Min NSR (120)*
<input type="checkbox"/>		\$5,556	FESOP Renewal / Sig NSR (120)*
<input type="checkbox"/>		\$5,556	FESOP NSC (Minor PSD/EO) (120)
<input type="checkbox"/>		\$9,525	FESOP NSC (Major PSD/EO) (270)
<input type="checkbox"/>		\$5,556	FESOP SPR (Minor PSD/EO) (120)
<input type="checkbox"/>		\$9,525	FESOP SPR (Major PSD/EO) (270)
<input type="checkbox"/>		\$793	FESOP w/NSR (120)*
<input type="checkbox"/>		\$5,556	FESOP w/NSR (120)*
FESOP Transition Fees			
<input type="checkbox"/>		\$1,587	FESOP Transition from TV (no NSR)
* Bill \$793 when the permit includes a modification (new or modified equipment) at MPR levels. Bill \$5,556 when the permit includes a modification (new or modified equipment) at SPR levels.			
Note: See "Transition scenarios - permits and fees" document located in SharePoint for more information on handling transition permits and associated fees.			

NSPS / NESHAP / 326 IAC 8-1-6 BACT / 326 IAC 2-4.1 MACT Review			
Number of Reviews	Total Fee	Fee	See "NSPS-NESHAP-BACT Billing Info" document for instructions
		\$793	for each review for an applicable NSPS
		\$793	for each review for an applicable NESHAP
		\$952	times each 326 IAC 8-1-6 BACT and each 326 IAC 2-4.1 MACT
For each best available control technology (BACT) analysis for VOC under 326 IAC 8-1-6 and for each maximum achievable control technology (MACT) under 326 IAC 2-4.1. [326 IAC 2-1.1-7(m)(5)]			

Other Fees			
<input type="checkbox"/>		\$793	Interim – Any type
<input type="checkbox"/>		\$793	Public Hearing

PSD BACT or LAER Review			
<input type="checkbox"/>		\$4,762	2 to 5 Review Analyses
<input type="checkbox"/>		\$9,525	6 to 10 Review Analyses
<input type="checkbox"/>		\$15,875	11 or more Review Analyses
Fees for BACT under 326 IAC 2-2-3 or LAER under 326 IAC 2-3-3 are per pollutant and per emissions unit or group of identical emissions units for which a control technology analysis is required. [326 IAC 2-1.1-7(m)(2)]			

Air Quality Impact Study Review			
Number of Pollutants	Total Fee	Fee	
		\$9,525	per pollutant if OAQ does the analysis
<input type="checkbox"/>		\$5,556	if applicant does the analysis (not dependent on number of pollutants)

Plantwide Applicability Limitation (PAL)		
PAL Pollutants (tons/year)	Total Fee	Instructions: enter total allowable tons under all PALs in the permit - fee, including max fee, will calculate automatically.
		PAL: separate fee per PAL pollutant. \$63 per ton of allowable emissions Maximum Combined fee for all PAL pollutants not to exceed \$63,500

\$0 Total Applicable Fee

OAQ Permits Branch Invoice Worksheet

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary). Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Source Name: _____

TEMPO AI: _____

Permit #: 0 _____

CST #: _____

Credit for permit fees: \$ _____

Credit Received Date: _____

Note: IDEM's accounting office requires that fee bills or refunds, be sent to the accounts Department at the billing address listed on application. If a courtesy copy is needed, please indicate at the bottom of this page.

Permit Reviewer please indicate applicable fees on page #2. Total will carry over to this page.

Total Due: \$ _____ \$0

Total Credit: \$ _____ \$0

Total Permitting Fees Applicable: \$ _____ \$0

Total Refund Due: \$ _____

Reason for Refund:

Adjustments to Applicable Fees: \$ _____

Explanation of adjustments:

A courtesy copy of the billing has been requested by the applicant, please send to:

Name/Title: _____

Address: _____

Permit Reviewer: _____

Date: _____

BILLING WORKSHEET

SSOA Permits

For Applications Received On and After October 1, 2019

Permit #:

Permit Reviewer:

Application Received Date:

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary) and check the appropriate box or fill in the number of reviews. The total fee will be calculated at the bottom and transferred to the billing amount on the first page. Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

SSOA Fees			
<input type="checkbox"/>		\$5,556	SSOA New Source Review (120): 1 to 4 different types of SSOAs in the same application
<input type="checkbox"/>		\$793	SSOA - 1 to 4 different types of SSOAs in the same application
<input type="checkbox"/>		\$158	SSOA Relocation
<i>Note: See "Transition scenarios - permits and fees" document located in SharePoint for more information on handling transition permits and associated fees.</i>			

NSPS/NESHAP Review			
Number of Reviews	Total Fee	Fee	See "NSPS-NESHAP-BACT Billing Info" document for instructions
		\$793	for each review for an applicable NSPS
		\$793	for each review for an applicable NESHAP

Other Fees			
<input type="checkbox"/>		\$793	Public Hearing

\$0 Total Applicable Fee

OAQ Permits Branch Invoice Worksheet

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary). Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Source Name: _____

TEMPO AI: _____

Permit #: 0 _____

CST #: _____

Credit for permit fees: \$ _____

Credit Received Date: _____

Note: IDEM's accounting office requires that fee bills or refunds, be sent to the accounts Department at the billing address listed on application. If a courtesy copy is needed, please indicate at the bottom of this page.

Permit Reviewer please indicate applicable fees on page #2. Total will carry over to this page.

Total Due: \$ _____ \$0

Total Credit: \$ _____ \$0

Total Permitting Fees Applicable: \$ _____ \$0

Total Refund Due: \$ _____

Reason for Refund:

Adjustments to Applicable Fees: \$ _____

Explanation of adjustments:

A courtesy copy of the billing has been requested by the applicant, please send to:

Name/Title: _____

Address: _____

Permit Reviewer: _____

Date: _____

BILLING WORKSHEET
MSOP, Registration, Exemptions

For Applications Received On and After October 1, 2019

Permit #:

Permit Reviewer:

Application Received Date:

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary) and check the appropriate box or fill in the number of reviews. The total fee will be calculated at the bottom and transferred to the billing amount on the first page. Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Note: See "Transition scenarios - permits and fees" document located in SharePoint for more information on handling transition permits and associated fees.

MSOP Fees			
<input type="checkbox"/>		\$100	MSOP
<input type="checkbox"/>		\$600	MSOP w/NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP w/NSR (120)*
<input type="checkbox"/>		\$600	MSOP Min Permit Revision (45)
<input type="checkbox"/>		\$100	MSOP Renewal
<input type="checkbox"/>		\$600	MSOP Renewal / Minor NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP Renewal / Sig NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP NSC (Minor PSD/EO) (120)
<input type="checkbox"/>		\$6,000	MSOP NSC (Major PSD/EO) (270)
<input type="checkbox"/>		\$3,500	MSOP SPR (Minor PSD/EO) (120)
<input type="checkbox"/>		\$6,000	MSOP SPR (Major PSD/EO) (270)
<input type="checkbox"/>		\$100	MSOP Relocation

* Bill \$600 when the permit includes a modification (new or modified equipment) at MPR levels. Bill \$3500 when the permit includes a modification (new or modified equipment) at SPR levels.

Registration Fees			
<input type="checkbox"/>		\$600	Registration – (New Source subject to 326 IAC 2-5.1-2)
<input type="checkbox"/>		\$100	Registration Relocation
<input type="checkbox"/>		\$600	Registration Revision and Re-Registration – (Existing Sources subject to 326 IAC 2-5.5)

Exemption Fees			
<input type="checkbox"/>		\$100	Exemption

NSPS / NESHAP / 326 IAC 8-1-6 BACT / 326 IAC 2-4.1 MACT Review			
Number of Reviews	Total Fee	Fee	See "NSPS-NESHAP-BACT Billing Info" document for instructions.
		\$500	for each review for an applicable NSPS
		\$500	for each review for an applicable NESHAP
		\$600	times each 326 IAC 8-1-6 BACT and each 326 IAC 2-4.1 MACT

For each best available control technology (BACT) analysis for VOC under 326 IAC 8-1-6 and for each maximum achievable control technology (MACT) under 326 IAC 2-4.1. [326 IAC 2-1.1-7(m)(5)]

Other Fees			
<input type="checkbox"/>		\$500	Interim – Any type
<input type="checkbox"/>		\$500	Public Hearing

\$0 Total Applicable Fee

OAQ Permits Branch Invoice Worksheet

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary). Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Source Name: _____

TEMPO AI: _____

Permit #: 0 _____

CST #: _____

Credit for permit fees: \$ _____

Credit Received Date: _____

Note: IDEM's accounting office requires that fee bills or refunds, be sent to the accounts Department at the billing address listed on application. If a courtesy copy is needed, please indicate at the bottom of this page.

Permit Reviewer please indicate applicable fees on page #2. Total will carry over to this page.

Total Due: \$ _____ \$0

Total Credit: \$ _____ \$0

Total Permitting Fees Applicable: \$ _____ \$0

Total Refund Due: \$ _____

Reason for Refund:

Adjustments to Applicable Fees: \$ _____

Explanation of adjustments:

A courtesy copy of the billing has been requested by the applicant, please send to:

Name/Title: _____

Address: _____

Permit Reviewer: _____

Date: _____

Permit Writer Instructions

Download/save the spreadsheet to your AirPRO DocSet or computer.

The majority of the cells are locked and password protected. You can only enter data in the yellow-highlighted cells, select from drop down menu, and activate checks within the check boxes.

You can tab through all the yellow-highlighted cells, drop down menus, and check boxes on the Billing/Invoice Worksheets and complete applicable cells/check boxes.

Billing/Invoice Worksheets Specific Instructions

To activate a check box next to an applicable permit level or type of review, just left click within the box or to the right of the box. Then, the cell to the right (column B) will populate with the applicable fee.

- Once a check box has been activated, the description of the fee will automatically convert to bold/italic font.

Use of some yellow-highlighted cells require you to enter a value (i.e. number of NSPS, NESHAPs, BACT reviews, number of Air Quality Impact Study Review pollutant analyses, Plantwide Applicability Limitation (PAL) pollutant emissions)

- When you enter a value greater than zero (0), the cell to the right (column B) will update and reflect the total fee based on the value entered in the cell and the cost of each review/analysis/ton of emission.
- Once a value has been entered in the cell, the description of the fee will automatically convert to bold/italic font.

The Total Fee will be automatically calculated and shown at the bottom of column B on the Billing Worksheet page and on the Invoice Worksheet page.

Permit writer will:

- Upload the billing worksheet spreadsheet to the specific permit DocSet in AirPRO;
- Fill out the appropriate yellow-highlighted cells/boxes;
- Change the bottom worksheet tab color to yellow (right click on bottom tab, click on "Tab Color", and click on yellow color) to indicate the permit billing worksheet that was filled out;
- Save the billing worksheet as a minor version for review by the section chief;
- When the section chief has approved the billing worksheet and it is ready to be submitted to PASS, save the billing worksheet as a major version (permit writers do not need to create or upload an Adobe (pdf) copy of the billing worksheet).

PASS will fill out the remainder of Invoice Worksheet (green-highlighted cells) as they prepare the invoice.

PASS will create the Adobe (pdf) of the billing worksheet

Special notes for permit writers:

- Please do not attempt to adjust the margins or the print layout in any manner. The form is formatted to fit on a single page front and back.
- Please do not right click on check boxes to activate a check, because you could accidentally delete the check box. You only need to left click within the box or to the right of the box to activate a check for that box.
- Please do not use or edit the Developer Instructions worksheet (with the red tab), as it contains notes for future developer(s).
- Please do not use or edit the SHEET 1 worksheet or the Bucksip Developer Tab (with the red tab), as it contains some of the logic used for the other worksheets.

Developer Instructions

Each worksheet is protected. To unprotect a worksheet, use the following password: abc123

Cells that do not contain checkboxes or that do not need a value entered are locked.

SHEET 1: Column C cells are referenced by the worksheet check boxes that toggle between FALSE when the box isn't checked and TRUE when the box is checked.

Billing Worksheet Hidden Columns L and M

Column L is mostly just a double check that the total fee is being calculated correctly.

Column M is used in the logic statement for calculating the fees for Plantwide Applicability Limitations on the TV and FESOP worksheets.

Billing Worksheet Check Boxes (Column A)

To review the check box formatting/settings, do the following:

- Right click on a check box
- Chose "Format Control...", option from drop down menu
- Click on the "Control" tab
- The "Cell Link" Field contains a link to a cell on the SHEET 1 worksheet. This cell will toggle between FALSE when the box isn't checked and TRUE when the box is checked.

Billing Worksheet Column B (will output the applicable fee, if Column A contains an activated check box)

Column B contains a logic statement as follows:

- the logic statement looks at the SHEET 1 Column C cell to see if the cell associated with the check box is TRUE (box checked) or FALSE (box not checked).
- A value of TRUE in a SHEET 1 indicates the box was checked and the applicable fee applies.
- If TRUE, then the value in the Billing Worksheet Column C cell is inserted into the Billing Worksheet Column B cell.
- If FALSE, then nothing happens.

Billing Worksheet Column B (for Column A cells that require a value to be entered for the number of NSPS, NESHAPs, BACT reviews, number of Air Quality Impact Study Review pollutant analyses)

Column B contains a logic statement that multiplies the value entered in Billing Worksheet Column A (the # of reviews/analyses) by the value in Billing Worksheet Column C.

Billing Worksheet Column B (for Column A cells that require a value to be entered for the Plantwide Applicability Limitation (PAL) pollutant emissions in tons/year) - TV and FESOP worksheets

Column B contains a logic statement that uses Column M for calculating the PAL fees.

Billing Worksheet Column D

The Column D fee descriptions are conditionally formatted. If the box is checked or a value is entered in Column A, the description font will change to bold/italic.

This worksheet is for Developer use only. Not for perm

TV

FALSE	TV MSM (45)
FALSE	TV NSC (Minor PSD/EO) (120)
FALSE	TV NSC (Major PSD/EO) (270)
FALSE	TV SSM (Minor PSD/EO) (120)
FALSE	TV SSM (Major PSD/EO) (270)

FESOP

FALSE	FESOP Min Permit Revision (45)
FALSE	FESOP Renewal / Min NSR (120)
FALSE	FESOP Renewal / Sig NSR (120)
FALSE	FESOP NSC (Minor PSD/EO) (120)
FALSE	FESOP NSC (Major PSD/EO) (270)
FALSE	FESOP SPR (Minor PSD/EO) (120)
FALSE	FESOP SPR (Major PSD/EO) (270)
FALSE	FESOP w/NSR (120)*
FALSE	FESOP w/NSR (120)*
FALSE	FESOP Transition from TV

FALSE	SSOA New Source Review (120): 1 to 4 different types of SSOAs same application
FALSE	SSOA - 1 to 4 different types of SSOAs in the same application
FALSE	SSOA Relocation

FALSE	Interim – Any type
FALSE	Public Hearing

PSD BACT or LAER Review

FALSE	2 to 5 Review Analyses
FALSE	6 to 10 Review Analyses
FALSE	11 or more Review Analyses

Air Quality Impact Study Review

FALSE	if applicant does the analysis (not dependent on number of pollutant)
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MSOP

FALSE	MSOP
-------	------

FALSE	MSOP w/NSR (120)*
FALSE	MSOP w/NSR (120)*
FALSE	MSOP Min Permit Revision (45)
FALSE	MSOP Renewal
FALSE	MSOP Renewal / Minor NSR (120)*
FALSE	MSOP Renewal / Sig NSR (120)*
FALSE	MSOP NSC (Minor PSD/EO) (120)
FALSE	MSOP NSC (Major PSD/EO) (270)
FALSE	MSOP SPR (Minor PSD/EO) (120)
FALSE	MSOP SPR (Major PSD/EO) (270)
FALSE	MSOP Relocation

FALSE	Registration – (New Source subject to 326 IAC 2-5.1-2)
FALSE	Registration Relocation
FALSE	Registration Revision and Re-Registration – (Existing Sources subj IAC 2-5.5)

FALSE	Exemption
-------	-----------

FALSE	Interim – Any type
FALSE	Public Hearing

it writer use.

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its)

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This worksheet is for Developer use only. Not for

Permit Status Drop Down Table

Section Drop Down Table

Permit Level Type Drop Down Table

Permit Sub type Type Drop Down Table

Dynamic List of Subtypes (changes k

Number of Subtype Options =

Using the Formulas > Name Manage
only for the number of subtypes cou
tool, the routing slip permit subtype

- 1
- 2
- 3
- 4

	5
	6
	7
	8
	9
	10
	11
	12
	13
	14

These permit types must be exactly the same as the list above ----->

Lookup Value	
Permit Type	
(select permit level)	
Title V	
Title V (Administrative Permit)	
FESOP	
FESOP (Administrative Permit)	
MSOP	
SSOA	
Registration	
Exemption	
PBR	
Review Request	
Acid Rain	

r permit writer use.

Public Notice
Proposed
Final

1
2
3
4
5
6

(select permit level)
Title V
Title V (Administrative Permit)
FESOP
FESOP (Administrative Permit)
MSOP
SSOA
Registration
Exemption
PBR
Review Request
Acid Rain

based on Permit Level type selected)

14
r button, the below list is named "PermitSubtype"
nted above. Using the Data > Data Validation
uses the "PermitSubType" range.
New Source Construction (120)
New Source Construction (270)
MSM (45)
SSM (120)

<---This formula counts all Permit Subtypes that are not "-")

SSM (270)
 AA
 MPM
 SPM
 Renewal
 Interim MSM
 Interim SSM
 Enforcement Referral
 Relocation
 Revocation

Title V		(Selected on the Routing Slip)	
1	2	3	
	-	-	
New Source Construction (120)	New Source Construction (270)	MSM (45)	
MSM (45)	SSM (120)	SSM (270)	
New Source Construction (120)	FESOP with NSR (120)	FESOP (no NSR)	
FESOP with NSR (120)	FESOP (no NSR)	AA	
New Source Construction (120)	MSOP with NSR (120)	MSOP (no NSR)	
SSOA with NSR (120)	SSOA (no NSR)	AA	
Registration (60)	AA	Registration Revision	
	Relocation	Revocation	
	Enforcement Referral	Relocation	
	-	-	
	AA	Modification	

Green highlighted cells above are for a "blank" sub type option (includes 10 spaces instead of nothing). Do not include a dash in these cells.

	4	5	6	7
-	-	-	-	-
SSM (120)	SSM (270)	AA	MPM	
AA	MPM	SPM	Renewal	
AA	MPR (45)	SPR (120)	Renewal	
MPR (45)	SPR (120)	Renewal	Renewal with NSR (120)	
AA	MPR (45)	SPR (120)	Renewal	
Enforcement Referral	Relocation	Revocation	-	
Reregistration	Enforcement Referral	Relocation	Revocation	
-	-	-	-	
Revocation	-	-	-	
-	-	-	-	
Renewal	Enforcement Referral	Revocation	-	

8	9	10	11
-	-	-	-
SPM	Renewal	Interim MSM	Interim SSM
Interim MSM	Interim SSM	Enforcement Referral	Relocation
Renewal with NSR (120)	Interim MPR	Interim SPR	Enforcement Referral
Interim MPR	Interim SPR	Enforcement Referral	Relocation
Renewal with NSR (120)	Interim MPR	Interim SPR	Enforcement Referral
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-

