

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

OFFICE MEMORANDUM

Date: July 2, 2024

To: Lindsey Hummel
Solid Waste Permits Section

Thru: Shyamala Raman *ace* 7/2/24
Engineering Section Chief

From: Jackson Moore
Engineering Section

Subject: *Permit Renewal Application*
Application dated September 25, 2023
VFC #[83536840](#)
Reworld Environmental Solutions, LLC
Porter County
SW Program ID 64-09
eRTE# 16534

Introduction

I reviewed the permit renewal application dated September 25, 2023 (VFC #[83536840](#)) and responses to requests for additional information dated May 31, 2024 (VFC #[83655581](#)), July 1, 2024 (VFC #[83661051](#)), and July 2, 2024 (VFC #pending) for Reworld Solutions, LLC (Reworld) (formerly Covanta Environmental Solutions, LLC), a solid waste processing facility in Porter County. The facility underwent a name change from Covanta Environmental Solutions, LLC, to Reworld Solutions, LLC in correspondence dated April 29, 2024 (VFC #[83650210](#)). IDEM received the application from Sue Gau, an environmental compliance manager with the facility.

The current permit is dated February 6, 2019 (VFC #[82688225](#)).

Summary

The facility processes nonhazardous waste including, but not limited to, wastewater, sludge waste, packaged liquid non-putrescible organic food waste, packaged inorganic liquid wastes, packaged solid organic non-putrescible food wastes, packaged inorganic solids, and residuals contained in tanker trucks and totes. Solid waste is received in non-bulk containers, roll-off containers, and tankers. Processing activities include shredding, blending for energy from waste disposal, solidification of solid waste, decanting and storage of wastewater destined for off-site processing, and centralized wastewater treatment. The facility is also a registered hazardous transfer facility since April 2017.

The facility has the following storage:

- 2 – 4,000 gallon offloading auger boxes
- 8 – 7,000 gallon treatment tanks
- 6 – 6,000 gallon treatment tanks
- 1 – 2,500 gallon clarifier tank
- 5 – 21,000 gallon effluent holding tanks

The facility underwent a name change from Covanta Environmental Solutions, LLC, to Reworld Solutions, LLC in correspondence dated April 29, 2024 (VFC #[83650210](#)).

Modifications since the previous renewal

- A minor modification for adding a new loading dock approved June 18, 2019 (VFC #[82794921](#)) which increased facility storage capacity to 504 tons. This modification replaced the previous requirements B1, B3, B4, B9, and B15 and added two compliance schedule requirements, D6 and D7.
- The minor modification approved July 1, 2019 (VFC #[82802465](#)) for the installation and operation of a new hydraulic rotary shear shredder to de-package containers. This modification added requirement B16.
- The insignificant modification approved August 6, 2019 (VFC #[82820946](#)) included revisions to the facility operations plan.
- The minor modification approved May 19, 2020 (VFC #[82970722](#)) for the installation of a 1,122-gallon primary containment steel sump for a washout near the solidification pits. This modification added requirement B17.
- The minor modification approved December 18, 2020 (VFC #[83085271](#)) for the installation of 3 additional 6,000-gallon tanks for wastewater storage and treatment. This modification revised requirements B7 and B8 and added requirements B18 and D8, the latter of which required an increase in financial assurance.
- The insignificant modification approved January 26, 2021 (VFC #[83099293](#)) altered the dimensions of the cleanout approved for construction in the modification approved May 19, 2020.

The facility currently receives 118,000 gallons of wastewater and 365 tons of solid waste per day. The total facility area is 4.69 acres. The current solid waste processing permit allows for the storage of 259,375 gallons of wastewater and 504 tons of nonhazardous waste in the facility at any one time.

The recent inspection reports did not note any violations. A minor fire incident was reported to IDEM staff on March 21, 2022 (VFC #[83295505](#)).

Modifications Included in the Renewal Application

The renewal application includes the following proposed modifications:

- Modification to the Facility Weekly Operations and Safety Checklist, which was previously titled the Weekly Dog Collar Inspection Form. The checklist was modified to eliminate tasks that are not applicable to the facility.
- Designating the Offloading Bay 1 area in the centralized wastewater treatment building as a containerized waste storage area, with this area having a dual purpose of either an offload bay or container storage area. The area, which is 1,135 square feet, can hold a total of 550 drums (double stacked), or 124 tons. This additional storage will increase the facility's maximum storage capacity to 189,500 gallons of wastewater for centralized wastewater treatment, 18,000 gallons for LDI disposal, and 795.98 tons for solidification, with final disposal at a landfill or energy from waste facility. Based on the history of operations at the facility, an estimated 90% of the capacity will be used during routine operations. The maximum volume of waste in storage or treatment, at one time, which will occur during the life of the facility is estimated at 186,750 gallons wastewater and 716 tons of solid waste. Revised financial assurance calculations are included with the renewal application. The closure bond will be adjusted upon approval from IDEM.
- The facility's solid waste processing permit currently allows for the processing and management of a maximum of 118,000 gallons wastewater and 365 tons of solid waste per day. CES requests the permit be modified to allow the facility to process an additional 35 tons per day, resulting in a maximum of 118,000 gallons of wastewater and 400 tons solid waste per day, a 9.6% increase to the current solid waste per day processing capacity. No changes are needed to the processing system to allow for this additional capacity.

The facility has received Storm Water No Exposure Exclusion Permit #INRX00559 from OWQ. The Industrial Pretreatment Permit Number #INP000247 is effective September 1, 2021.

Response to RAI

The following details were provided by the facility in response to IDEM's RAI dated May 31, 2024:

- Clarified whether hazardous waste was stored within the building and how hazardous waste is kept segregated from solid waste.
- Updated weekly inspection report form to remove a reference to its previous title.
- Updated site plan including dimensions for all storage areas in the facility.
- Updated closure cost estimate including post-closure activities.
- Rationale for the proposed increase in storage capacity on site.
- Clarified the capacity of two offloading augur boxes.
- Provided information on a fire incident and facility procedures that were modified

as a result.

- Described how overflow for tanks used for settling/storage and the centralized wastewater treatment process is prevented.

The response mentioned the Combustible Dust Safety Plan and not operating the shredder while unloading sawdust to prevent fires, but the Operations Plan was not revised to reflect these. Requirements will be added in the approval regarding these.

Additional information regarding facility name change, contingency cost, and legal description was requested in an email sent to the facility on June 27, 2024. The updated permit renewal application form and closure cost estimate including a contingency cost was received July 1, 2024 (VFC # 83661051). An updated legal description and clarification regarding the facility's acreage was received July 2, 2024 (VFC #pending).

Recommendations

The Engineering Section recommends approval of the permit renewal. The permit requirements are included below.

**Permit Renewal Approval Requirements
Covanta Environmental Solutions, LLC
Solid Waste Program ID 64-09
Porter County**

For the cover:

The facility is a solid waste processing facility that accepts, stores, and processes nonhazardous liquid and solid waste including, but not limited to, wastewater, sludge waste, packaged liquid non-putrescible organic food waste, packaged inorganic liquid wastes, packaged solid organic non-putrescible food wastes, packaged inorganic solids, and residuals contained in tanker trucks and totes. Solid waste is received in non-bulk containers, roll-off containers and tankers. Solid waste activities include shredding, blending for energy from waste disposal, solidification, decanting. The facility sends the processed solid waste to a permitted energy recovery or a disposal facility. The facility also operates a Centralized Wastewater Pretreatment Facility for nonhazardous wastewater. The treated wastewater is either discharged to the City of Portage's publicly owned treatment works (POTW), subject to an NPDES permit, or shipped offsite to a facility permitted to accept this waste.

The permittee also operates a hazardous waste transfer facility at this location not subject to this permit.

This permit approval includes modifications proposed in the permit renewal application that allows Reworld Solutions, LLC to do the following at the facility:

1. Revise the Facility Weekly Operations and Safety Checklist, previously titled the Weekly Dog Collar Inspection Form. The revisions eliminate tasks that are not applicable to the facility.
2. Designating the 1,135-square foot Offloading Bay 1 area in the centralized wastewater treatment building as a containerized waste storage area, with dual purpose, for 550 double-stacked drums with a capacity of 124 tons.
3. Increase the processing capacity by 35 tons per day, resulting in a maximum processing capacity of 118,000 gallons of wastewater and 400 tons solid waste per day.

The facility receives and processes a maximum of 400 tons of non-hazardous solid waste and 118,000 gallons of non-hazardous wastewater per day. The facility has approximately 4.69 acres approved for processing and is located at 5625 Old Porter Road in Portage, Porter County.

Please note Section I, Compliance Schedule Requirements contains deadlines for submitting documents to IDEM for approval.

Documents related to this approval include the permit renewal application dated September 25, 2023 (VFC #[83536840](#)) and responses to requests for additional information dated May 31, 2024 (VFC #[83655581](#)), July 1, 2024 (VFC #[83661051](#)), and July 2, 2024 (VFC #pending).

PERMIT REQUIREMENTS

- A. General Requirements
- B. Operational Requirements
- C. Closure/Post-Closure Requirements
- D. Compliance Schedule Requirements

A. GENERAL REQUIREMENTS

(Permit manager will write this section; please note/add the following)

- A3. The permittee must call **(888) 233-7745** (IDEM's emergency response line) as soon as possible after learning of any event related to the facility that may cause an imminent and substantial endangerment to human health or the environment, such as a reportable spill (327 IAC 2-6.1) or a fire or explosion.

The permittee must also submit a written report to either the email address or the physical address (email preferred) listed in Requirement A4 within 5 business days after the event. The report must describe the event and actions taken or planned to correct the event and prevent its recurrence.

- A5. The permittee must meet the following requirements regarding records and reports:
- a. Maintain all required records and reports (329 IAC 11-1-3) and provide them for review upon request by an authorized representative of IDEM (329 IAC 11-13.5-9).
 - b. Submit quarterly tonnage reports (329 IAC 11-14-1) through the Re-TRAC Connect website: <https://connect.re-trac.com/>. An Account is already set up for you to submit this information. To obtain your login credentials, please e-mail olqregulatoryreporting@idem.IN.gov with your permit number and contact information. Each report must include the tonnage of waste or recyclables received by and delivered to the facility during the period for which the report is being submitted. Reports must be submitted by the fifteenth day of the first month after the end of the period for which the report is being submitted.
 - c. The permittee must maintain copies of these quarterly tonnage reports at the facility for at least three years (329 IAC 11-14-1(g)).
- A6. As a recipient of industrial process waste (329 IAC 11-2-17), the permittee must comply with the storm water requirements at 327 IAC 15-6.
- A7. The permittee must pay an annual operation fee of \$3,500 pursuant to IC 13-16-1-4 and 329 IAC 11-9-4 if the facility is permitted on January 1 of the billing year. IDEM is required to invoice this fee by January 15 of each year (IC 13-20-21-8). Payments can be made as described on the invoice.
- A8. This permit approval does not relieve the permittee of the obligation to comply with the requirements of any current enforcement action on the permit.

B. OPERATIONAL REQUIREMENTS

- B1. The facility consists of the following components: a processing building with two solidification pits, an auger for solidification media, container storage areas, storage tanks, wastewater treatment tanks, and other ancillary equipment used for treating and processing solid waste, including wastewater.

The permittee must comply with the operational requirements in 329 IAC 11-13.5 (Operational Requirements), the revised operating plan dated May 21, 2024 (VFC #[83655581](#), pp. 16-57 of 57), and the following:

- a. Conduct all solid waste processing activities within the building as depicted on the drawing titled "Site Plan" dated April 13, 2018 and submitted May 31, 2024 (VFC [83655581](#), p. 57 of 57).
- b. Perform daily housekeeping and maintenance of the storage and processing areas.
- c. Maintain the processing facility, storage areas, and adjacent areas clean and litter free when not in use, following the cleanup procedures described under Daily Clean Up Procedures in the operating plan revised May 21, 2024 (VFC #[83655581](#), p. 32 of 57). The permittee must document routine cleanup in the facility operating record.
- d. Each operating day, monitor the storage and processing areas for potential problems, including any leaks, cracks, or damage to equipment, and containment structures, as described on page 17 of the Operating Plan (VFC #[83655581](#), p. 32 of 57) and Attachment C of the May 21, 2024 submittal (VFC #[83655581](#), pp. 41-47 of 57). Document problems observed and any repairs performed in the facility operating record.
- e. Monitor, each operating week, the pit monitoring wells, for the presence of liquids. Document the inspections, observations, and any corrective action performed in the facility operating record.
- f. During freezing winter conditions, conduct additional inspections of the wastewater treatment tanks and equipment to identify operational problems.
- g. Clean and inspect, semi-annually, the interior of the solidification pits and repair any cracks found in structures.
- h. Promptly correct any nuisance, pollution conditions, or litter in the building or on the grounds.

- i. If the facility is unable to operate continually for more than 24 hours, implement the contingency plan described in Section G of the operating plan (VFC# [83655581](#), pp. 28-29 of 57).
 - j. When responding to emergency incidents such as fire, spill, or other event that could endanger human health or the environment, follow the procedures described in the "Emergency Action Plan", dated July 19, 2023 (VFC #[83536840](#), pp. 58 - 88 of 102).
 - k. Promptly contain any spills in processing or storage areas. Recover and containerize any waste spilled.
 - l. The permittee must maintain the ground surface and paved areas of the facility to promote surface water runoff away from waste processing and storage areas.
 - m. Maintain records of inspections specified in Requirements B1c, B1d, B1e, B1g, and B1i in the operating records for at least three years.
The permittee must not accept the following waste:
- B2. The permittee is approved to accept only solid waste as defined by 329 IAC 11-2-39 and as specified in Section C of the operating plan (VFC# [83655581](#), pp. 25-26 of 57).
- B3. The permittee must not accept the following waste:
- a. Hazardous waste as defined by 329 IAC 3.1
 - b. Waste or material containing PCBs from a source concentration of 50 ppm or greater regulated by 329 IAC 4.1.
 - c. Regulated asbestos waste defined in 40 CFR 61.141 or 329 IAC 11-2-32.3
 - d. Toxic Substance Control Act (TSCA) waste regulated under 329 IAC 4.1 and 40 CFR Part 761
 - e. Mercury or mercury containing waste
 - f. Very Small Quantity Generator (VSQG) hazardous waste (329 IAC 11-2-5.3)
 - g. Radioactive material.
 - h. Treated and/or untreated infectious waste as regulated and defined under IC 13-11-2-235 and 410 IAC 1-3.
- B4. The permittee must verify the following upon arrival and before acceptance of each shipment of waste:
- a. Confirm the number of containers received.

- b. Confirm the waste listed on the shipping papers matches the labels on the containers.
 - c. Confirm the waste listed on the label is an approved type of waste that can be accepted by the facility. If the waste is not approved, the unapproved load or the unapproved portions of the load will be refused.
 - d. Verify the containers are in good condition. Immediately over-pack any leaking containers, and properly clean up any releases.
- B5. The permittee must follow the “Waste Screening” procedure described on pages 11 and 12 of the operating plan revised May 21, 2024 (VFC #[83655581](#), pp. 26-27 of 57) to verify through profiling and analysis results and/or generator’s knowledge that the initial load is all of the following:
- a. One of the waste types approved by Requirement B2,
 - b. Not prohibited by Requirement B3, and
 - c. Compatible with the facility’s processes.
- B6. If a sample from a subsequent load shows that the waste is not consistent with the sampling and analysis documentation provided with initial load, the permittee must either:
- a. Resolve the discrepancy in consultation with the generator before accepting the load, or
 - b. Refuse the load.
- B7. The permittee must maintain the name of the generator, the generator’s address, the type of wastes accepted, and the sampling and analysis documentation in the facility’s operating record for three years.

Generators desiring further information on mercury separation, elimination, identification, reclamation, or recycling can contact IDEM’s Office of Compliance and Technical Assistance at (800) 988-7901 or (317) 232-8172, or access the IDEM mercury website at:

https://www.in.gov/idem/health/files/mercury_spill_info_for_homes.pdf

- B8. The permittee is approved to process a maximum of 118,000 gallons of wastewater per day in the wastewater treatment process and up to 400 tons of solid waste per day in the solidification process.
- B9. The permittee may have onsite no more than 186,750 gallons of wastewater at

any time. The maximum capacity permitted is 90% of the design capacity of the following units. The permittee may store in the following units:

- a. 2 – 4,000 gallon offloading auger boxes
- b. 8 – 7,000 gallon treatment tanks
- c. 6 – 6,000 gallon treatment tanks
- d. 1 – 2,500 gallon treatment tank
- e. 3 – 21,000 gallon MBBR reactor tanks
- f. 2 – 21,000 gallon effluent holding tanks

B10. The permittee may have a maximum of 716 tons of solid waste in the eight container storage areas and two solidification pits shown in Sheet 1, titled “Site Plan”, dated May 31, 2024 (VFC #[83655581](#), p. 12 of 57). The maximum capacity permitted is 90% of the design capacity of the following area described as follows:

Storage Area Name	Storage Area Volume/Square Feet (SF)	Number of Units/Drums	Design Capacity
Solidification Pit	26,000 gallons	2 pits	52,000 gallons or 260 tons
Container Storage Area 1	960 SF	720 drums	162 tons
Container Storage Area 2	136 SF	93	20.93 tons
Container Storage Area 3	760 SF	570 drums	128.25 tons
Container Storage Area 4	130 SF	64 drums	14.40 tons
Container Storage Area 5	66 SF	32 drums	7.20 tons
Container Storage Area 6	66 SF	32 drums	7.20 tons
Container Storage Area 7	1060 SF	320 drums	72 tons
Container Storage Area 8	1135 SF	550 drums	124 tons

B11. The permittees are approved to conduct the following processing and storage activities at the site: de-packaging, shredding, blending, decanting, solidification, and wastewater pretreatment. All processing activities are conducted inside the building.

B12. The permittee may operate two pits, each with a capacity of 100 cubic yards, for solidification of non-hazardous waste as follows:

- a. Use only saw dust to solidify waste.
 - b. Solidify wastes containing free liquids uniformly by employing sufficient time for absorption and mixing with sawdust during the solidification process.
 - b. The solidified waste must pass the Method 9095A (Paint Filter Liquids Test) described in 329 IAC 11-2-20.4 before shipping it to a landfill.
 - c. The permittee may request approval for additional absorption agents through an insignificant modification under 329 IAC 11-9-6(c).
- B13. The permittee is approved to install and operate a 1,122-gallon primary steel containment for receiving tanker/roll-off heel washout in compliance with the following. The permittee must:
- a. Follow the procedures described in Addendum III to the Facility Operations Plan, titled "Clean Out Area," submitted with the minor modification application dated March 10, 2020 (VFC #[82932159](#), p. 12-13 of 18).
 - b. Inspect the containment for leaks and spills and recover any waste spilled and manage it in the solidification pits.
- B14. The permittee is approved to operate an SSI Model M120E 300 Hp. shredder, at a capacity of about eight tons per hour, to de-package containers and shred bulk solid waste. The permittee must operate the shredder as described in Addendum I to the Facility Operations Plan, submitted with the minor modification application dated May 14, 2019 (VFC #[82774654](#), pp. 12-13 of 25).
- B15. The permittees must not operate the shredder when unloading sawdust. The permittees must follow the Combustible Dust Safety Plan dated --- (VFC #---, pp. -- of --).
- B16. The permittee must have a manager who has successfully completed a program of classroom instruction or on-the-job training to conduct the facility's operations properly in compliance with the operation plan and this permit. The permittee must keep documentation on-site verifying successful completion of this instruction or training. While the facility is operating, the trained supervisor or operator must be available on-site or, if not present at the facility, be available through an electronic communication device, such as a telephone.
- B17. The permittee must train operators to do the following:
- a. Recognize the prohibited wastes listed in Requirement B3,

- b. Use personal protective equipment when handling solid waste, and
 - c. Properly operate the waste processing equipment
- B18. The permittee must transport all solid waste and wastewater offsite to permitted facilities in compliance with local, state, and federal regulations.
- B19. The permittee must accurately calibrate and maintain the analytical instruments and measurement devices, including analytical instruments and measurement devices used to evaluate wastes according to the manufacturer's specifications and maintain records on-site for at least three years regarding these calibration and measurement activities (329 IAC 11-1-3(c)).
- B20. The permittee must maintain records and reports as described in Section Q of the operating plan revised May 21, 2024 (VFC #[83655581](#), pp. 32-33 of 57):
- a. Signed and dated training records for requirement B16 and B17 of this permit.
 - b. Waste determination records
 - c. Waste acceptance records for requirement B5, B6, and B7
 - d. Inspection and maintenance reports for requirement B1
 - e. Quarterly reports
 - f. All test results of residues generated by the facility.

C. CLOSURE/POST-CLOSURE AND FINANCIAL RESPONSIBILITY REQUIREMENTS

- C1. The permittee must maintain financial assurance in an amount not less than the estimated costs of closure and post-closure as required by 329 IAC 11-16-1 referencing 329 IAC 10-39. The permittee must submit the financial assurance mechanism updates used to meet this requirement in accordance with 329 IAC 10-39. The approved facility area subject to financial assurance is approximately 4.69 acres. The amount of the financial assurance mechanism must not be less than \$168,404.28 based on 2023-dollar value.
- C2. The permittee must annually review the financial assurance, and by June 15 of each year must:
- a. Adjust the cost estimates in Requirement C1 for inflation.
 - b. Revise the cost estimates to account for changes which increase the cost of closure and/or post-closure.

- c. The permittees may revise the cost estimates to account for changes which reduce the cost of closure and/or post-closure. The permittee must provide documentation supporting reduced cost-estimates.
 - d. Submit documentation showing that the financial assurance mechanism is adequate to cover the estimated costs of closure and post-closure. The permittee must submit signed originals of the financial assurance and/or updates used to meet this requirement.
- C3. The permittees must follow the closure and post-closure requirements of 329 IAC 11-16-3 and the facility's approved Closure and Post-Closure Plans and Cost Estimates submitted in the document dated May 21, 2024 (VFC #[83655581](#), pp. 29-30 of 57) and July 1, 2024 (VFC #[83661051](#), p.4 of 5)) when closing the facility and completing the one-year post-closure period.

D. COMPLIANCE SCHEDULE REQUIREMENTS

- D1. Within 60 days after receiving this approval, the permittees must submit the facility's Combustible Dust Safety Plan to IDEM for approval.