From:	James Capp
To:	Wessel, Tamera
Cc:	Lacey CHITWOOD; Steve CARTER; Mike CASPER; Chuck GIESIGE; Stephen BENNETT
Subject:	Garfield Facility LLC - Part 70 Operating Permit Renewal No.: T035-45333-00028
Date:	Friday, January 6, 2023 4:35:45 PM
Attachments:	2023.01.06 - Garfield - Comments on Draft Title V Permit Renewal signed.pdf

Tamera,

Please find attached our comments on the draft permit renewal. If you have any questions or need any clarification, please let me know.

James A. Capp
Director, Environmental Compliance

ELEMENT
RESOURCES

January 6, 2023

Sent via email

Tamera Wessel
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Re: Garfield Facility LLC in Delaware County
Part 70 Operating Permit Renewal No.: T035-45333-00028

Dear Ms. Wessel,

Thank you for the opportunity to provide comments on the draft Part 70 Operating Permit Renewal No.: T035-45333-00028 for Garfield Facility LLC in Delaware County. Garfield Facility LLC (facility) supports the preliminary findings of the Indiana Department of Environmental Management (IDEM) that the permit should be renewed. Overall we believe that IDEM has done a thorough job reviewing the permit application and drafting the permit and technical support document. During our review of the draft permit and technical support document we did identify some errors that are described below.

- New condition D.1.12(c) requires the facility to record the output of the sulfur dioxide continuous monitoring system and includes the following text in parenthesis, "(pounds per MMBtu)." The facility has no concerns with recording the output of the sulfur dioxide continuous monitoring system as required by the current permit and IDEM's regulations. However, the current Title V permit does not require the facility to record the output in units of pounds per MMBtu and the facility currently does not record the output in units of pounds per MMBtu. Further, there is no need or regulatory requirement to do so and doing so would require the facility to make costly modifications to the continuous monitoring system with no purpose. The facility currently records the output of the sulfur dioxide continuous monitoring system in units of ppm and then converts to pounds using flow data. Since IDEM has included the pounds per MMBtu language in parenthesis, the facility is interpreting this as an example of emission units that the system could use but it is not a requirement to use those specific units.
    - Recommendation: IDEM should remove the text in the parenthesis "(pounds per MMBtu)" from the permit condition to make clear that the continuous monitoring system output does not have to be in units of pounds per MMBtu.

- Permit condition D.3.6(b)(3) removed the 180 day timeframe to do the stack testing on Bin Room Baghouse No. 1 after HEPA filters are installed making it unclear when the stack testing should be done.
    - Recommendation: IDEM should restore the language that was in the previous Title V permit that the facility has 180 days to conduct stack testing once the HEPA filters are installed.
- There are two permit conditions D.3.11(c). This appears to be a numbering error.

Thank you again for the opportunity to comment on the draft Part 70 Operating Permit Renewal for Garfield Facility LLC. We look forward to working with IDEM to finalize the permit. If you have any questions about our comments, please contact me at 404-798-7936 or via email at james.capp@motrexllc.com.

Sincerely,

James Capp

James A. Capp
Director, Environmental Compliance

cc:
Steve Carter - (*via email only)*
Mike Casper - (*via email only)*
Chuck Giesige- (*via email only)*
Lacey Chitwood - (*via email only)*

From:	James Capp
To:	Wessel, Tamera
Cc:	Lacey CHITWOOD; Chuck GIESIGE; Stephen BENNETT; Steve CARTER; Mike CASPER
Subject:	Garfield Facility LLC - Part 70 Operating Permit Renewal No.: T035-45333-00028
Date:	Monday, February 6, 2023 9:47:07 PM
Attachments:	Exide 11-8-110001.pdf Muncie silt sample locations.pdf

Tamera,

Please find below responses to the questions you asked us to provide responses to. If you need anything further please let me know.

James Capp
Director, Environmental Compliance

Fugitive Dust Emissions: Regarding the fugitive dust emissions calculations (pages 15-21 of Appendix A of the TSD) MUNDELL identified the following issues: a. *Silt Loading Value:* It appears the fugitive dust calculations were separated mainly based on road type and varying silt loading values (sL). The cited silt loading value used in the calculations for each scenario is apparently based on a site-specific source sample.

i. For public transparency, please provide the documentation for the testing methodology and results that determined these site-specific silt loading values.

Roadway dust loading levels and silt content were determined by sampling conducted in November 2011 following the procedure set forth in AP-42 Appendix C.1 and Appendix C.2. Surface dust samples were collected by facility personnel in accordance with the Appendix C.1 procedures. Laboratory analysis of the samples was conducted by Penniman & Browne, Inc. in accordance with Appendix C.2.

Sampling was performed over four areas of the plant's onsite paved surface traffic routes.

[See attached drawing "Muncie silt sample locations.pdf']

Dimensions and total mass weight of collected dust and surface areas tabulated as:

	Wt (lb)
Area 1 ..... 60 ft x 12 ft = 720 sf	0.54
Area 2 .....50 ft x 86 ft = 4300 sf	0.52
Area 3 ..... 40 ft x 50 ft = 2000 sf	0.51
Area 4 ..... 40 ft x 20 ft = 800 sf	0.50

Silt content of each sample was determined by Penniman & Browne.

[see attached file "Exide 11-8-110001.pdf]

Silt loading levels in g/m^2 (sL) as cited on pages 15 -21 of Appendix A of the TSD for each area (Sector) are simply the result of calculation of the weight divided by the surface area with the silt percentage applied, and appropriately converting units.

Sector ID	Silt %	Sample Weight (lb)	Area (sqft)	sL (g/m^2)
1	80.9%	0.54	720	2.96
2	76.5%	0.52	4300	0.45
3	72.1%	0.51	2000	0.90
4	60.5%	0.50	800	1.85

ii. Please indicate under what conditions these silt loading values apply, and what requirements are in place to ensure that these silt loading values will remain accurate into the future. For example, what degree of pavement up-keep is necessary to ensure these values do not change over time?

This sampling was performed under normal operating conditions at the time in 2011. At that time, and continuing today, the facility has operated under a fugitive dust control plan as required under NESHAP Subpart X and the specific requirements for pavement cleaning as set forth in that NESHAP. There has been no relaxation in the NESHAP requirements for pavement cleaning and up-keep since the time of the roadway dust sampling that would lead to these values becoming heavier over time.

b. *Road Area Clarity:* Calculations presented on page 15 through 18 of Appendix A of the TDS separate paved roads by "sector" with each having a different silt loading factor. It is not clear how these "sectors" and corresponding silt loading factors are distributed across the property. For instance, review of Google Earth Imagery seems to indicate that there is one (1) drive entryway into the facility. As such, it would appear all vehicles included on "Sectors 1-4" would enter in this roadway, and thus should have the same silt loading factor for at least a portion of their drive. Please clarify this discrepancy to ensure the fugitive dust emissions are accurately and/or most conservatively estimated. In addition, a map clearly illustrating which portions of paved surfaces correspond to the respective silt loading factors would be most beneficial.

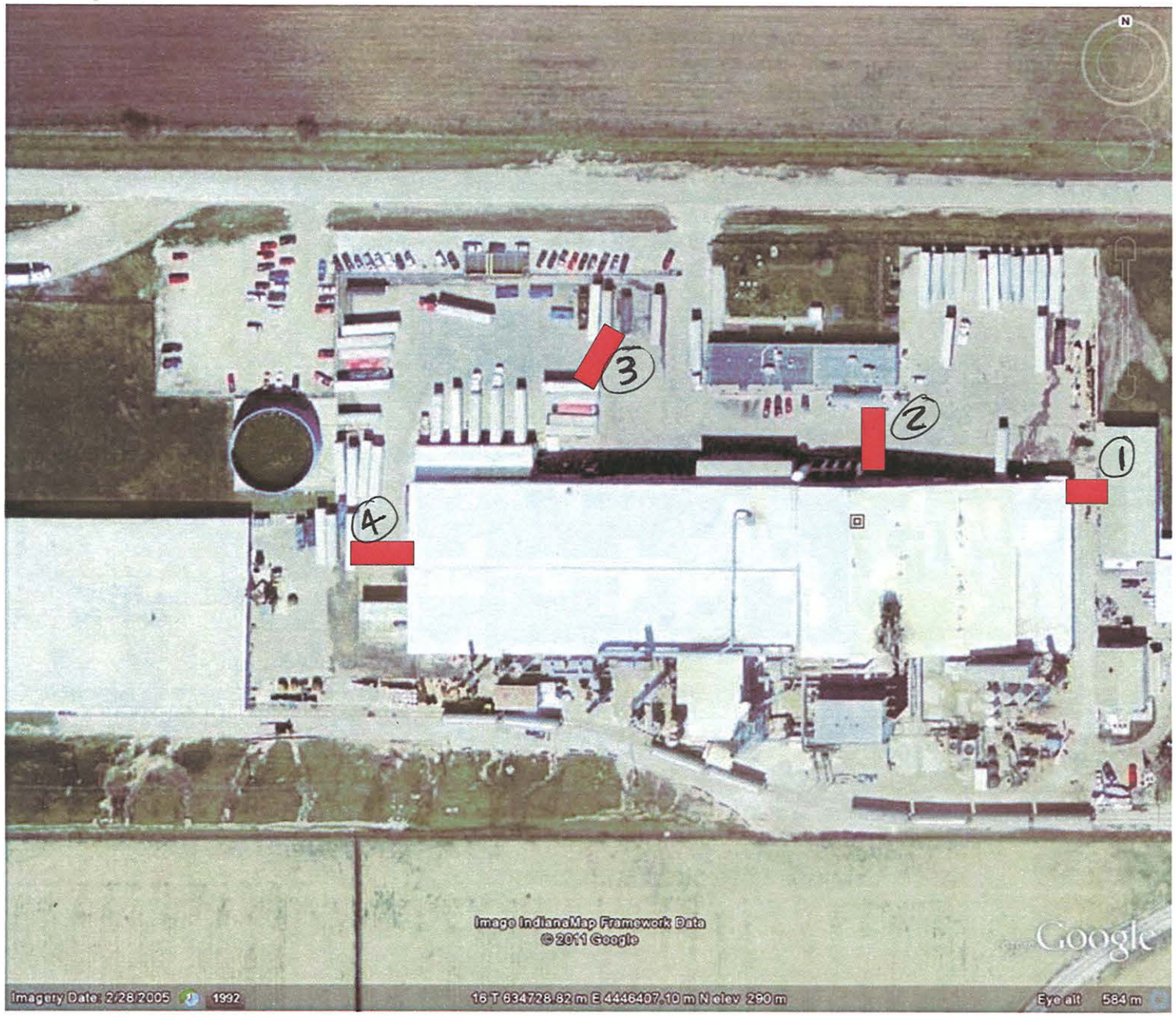
Please see the map provided ["Muncie silt sample locations.pdf"].

Calculations provided on pages 15-21 cite each Sector separately and covering all the traffic routes.

Vehicles can move:

- Through Sector 2 and then exit the facility;
- Through Sector 2 to Sector 1, which is why all vehicles in Sector 1 are also accounted for in Sector 2;
- Through Sector 3 and exit the facility; or,
- Through Sector 3 to Sector 4 and then exit the facility. All vehicles in Sector 4 are also accounted for in Sector 3 except Junk Transfers, which only occur in Sector 4.

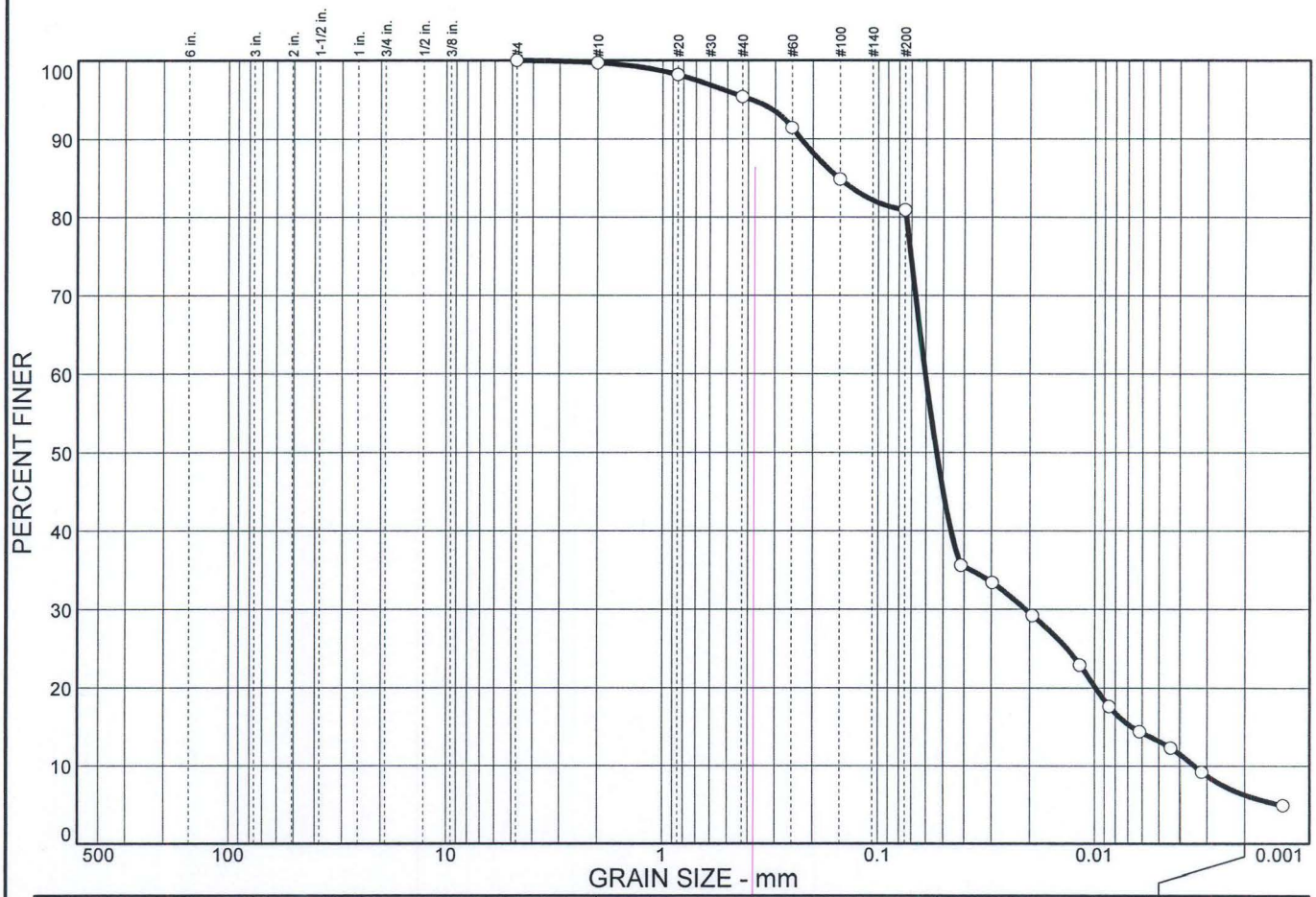
In the latest renewal, the paving of the truck lot was accounted for. In other words, calculations for all truck parking and turnaround were previously assumed to occur on unpaved roads, but the most recent renewal application accounted for the fact that the lot and turnaround area have been paved. Sampling was not conducted specifically on this sector, but it was conservatively assumed that the highest silt loading across all paved sectors applied to this paved truck lot.



Proposed Silt Sampling Location

ENVIRON		Proposed Silt Sampling Locations Exide Technologies – Muncie Recycling Facility	Figure 1
Drafted By: sph	Date: 8/11/2011		07-27999A

Particle Size Distribution Report



% COBBLES	% GRAVEL	% SAND	% SILT	% CLAY
0.0	0.3	50.7	42.7	6.3

SIEVE SIZE	PERCENT FINER	SPEC.* PERCENT	PASS? (X=NO)
#4	100.0		
#10	99.7		
#20	98.2		
#40	95.4		
#60	91.4		
#100	84.8		
#200	80.9		

* (no specification provided)

Material Description

GRAY Silt with sand(Sandy loam USDA)

Atterberg Limits

PL= LL= PI=

Coefficients

D_{85}= 0.153 D_{60}= 0.0605 D_{50}= 0.0537
D_{30}= 0.0209 D_{15}= 0.0067 D_{10}= 0.0035
C_u= 17.53 C_c= 2.10

Classification

USCS= ML AASHTO= A-4(0)

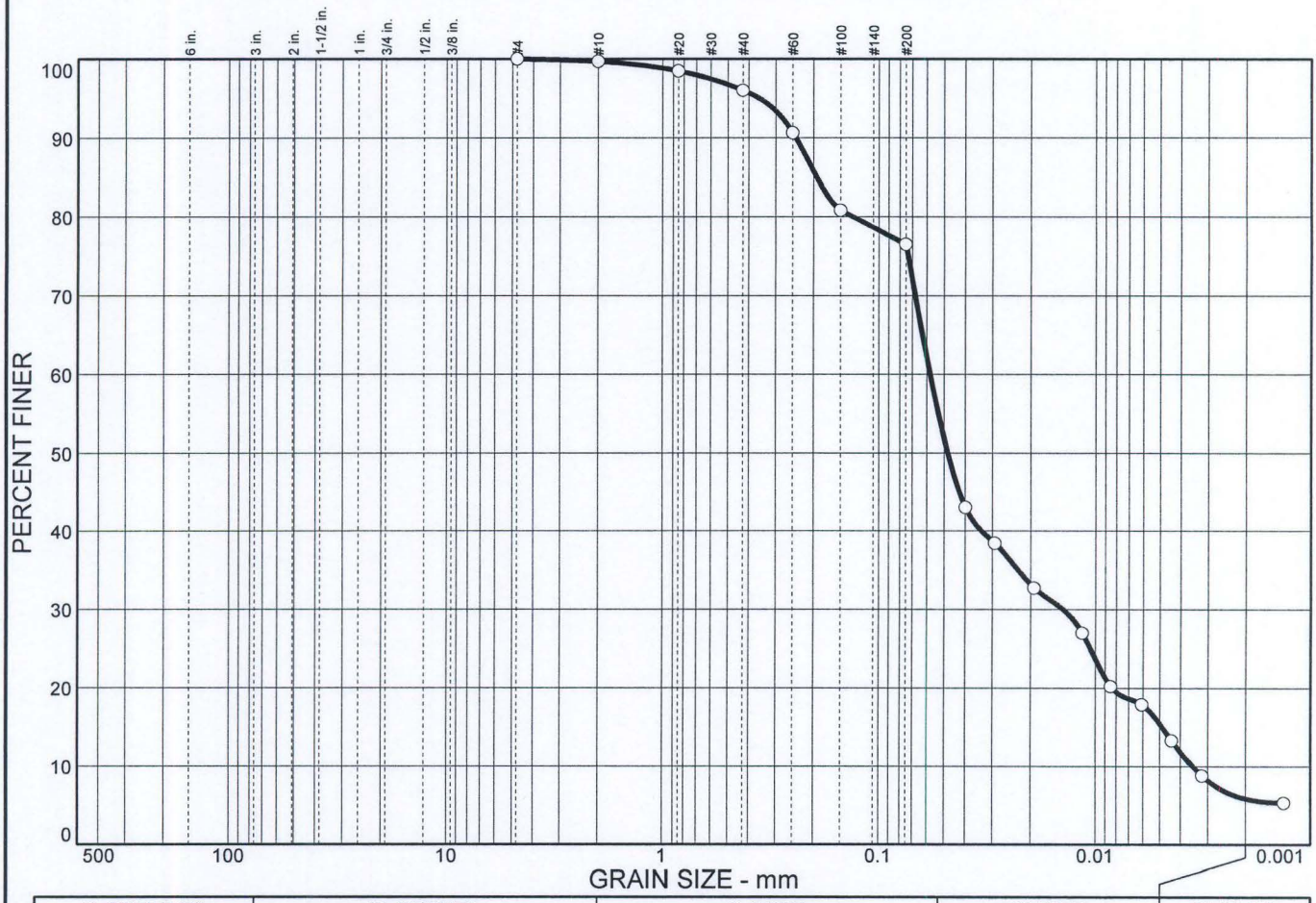
Remarks

Sample No.: 11.2.11 #1 **Source of Sample:** **Date:** 11.7.11
Location: **Elev./Depth:**

PENNIMAN & BROWNE, INC.

Client: EXIDE TECHNOLOGIES
Project: N/A
Project No: 201104484 **Figure**

Particle Size Distribution Report



% COBBLES	% GRAVEL	% SAND	% SILT	% CLAY
0.0	0.3	44.9	49.0	5.8

SIEVE SIZE	PERCENT FINER	SPEC.* PERCENT	PASS? (X=NO)
#4	100.0		
#10	99.7		
#20	98.5		
#40	96.0		
#60	90.6		
#100	80.8		
#200	76.5		

* (no specification provided)

Material Description

GRAY Silt with sand(Sandy loam USDA)

Atterberg Limits

PL= LL= PI=

Coefficients

D_{85}= 0.194 D_{60}= 0.0580 D_{50}= 0.0482
D_{30}= 0.0142 D_{15}= 0.0049 D_{10}= 0.0035
C_u= 16.44 C_c= 0.98

Classification

USCS= ML AASHTO= A-4(0)

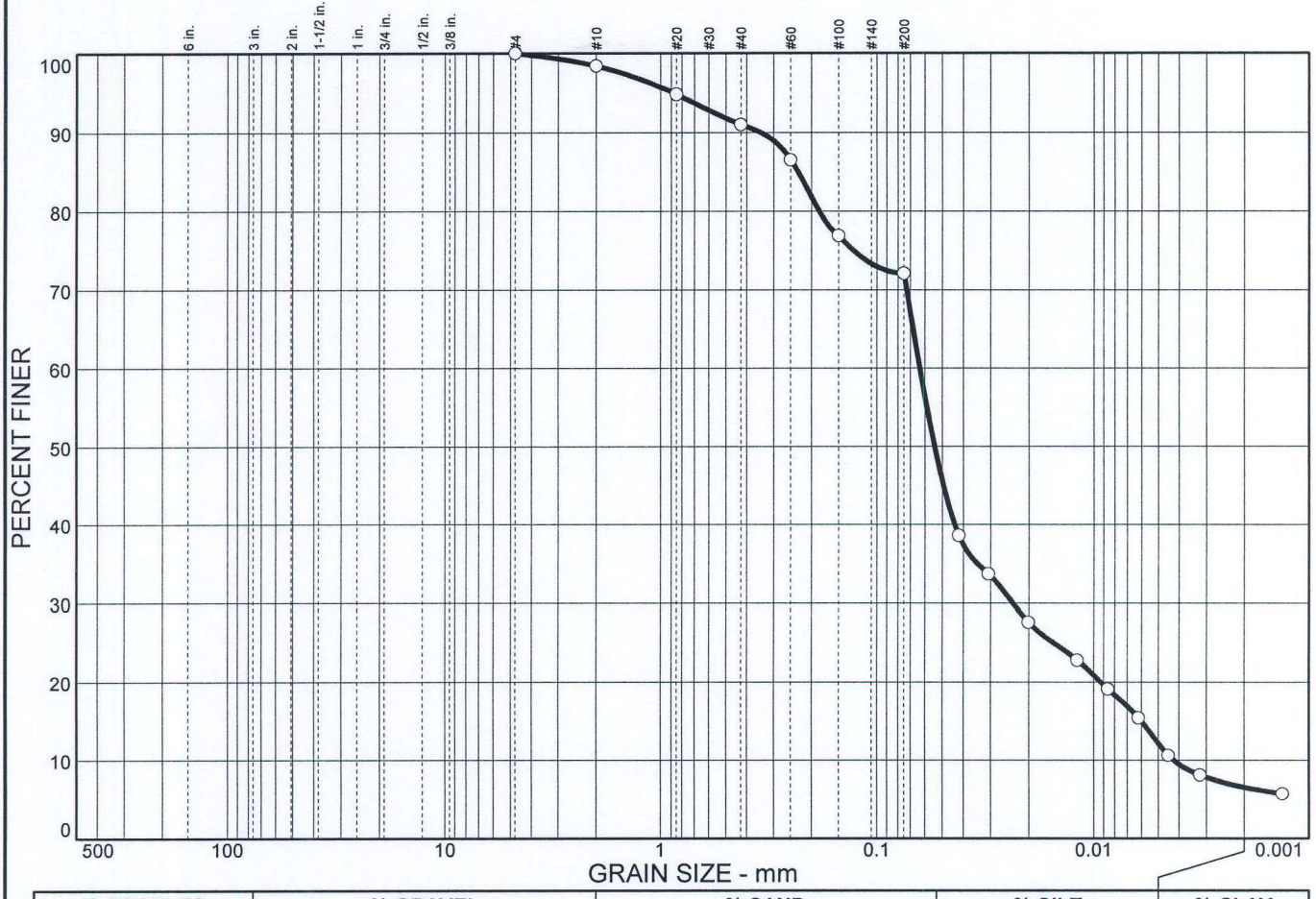
Remarks

Sample No.: 11.2.11 #2 **Source of Sample:** **Date:** 11.7.11
Location: **Elev./Depth:**

PENNIMAN & BROWNE, INC.

Client: EXIDE TECHNOLOGIES
Project: N/A
Project No: 201104484 **Figure**

Particle Size Distribution Report



% COBBLES	% GRAVEL	% SAND	% SILT	% CLAY
0.0	1.6	49.8	42.1	6.5

SIEVE SIZE	PERCENT FINER	SPEC.* PERCENT	PASS? (X=NO)
#4	100.0		
#10	98.4		
#20	94.8		
#40	91.0		
#60	86.5		
#100	76.9		
#200	72.1		

* (no specification provided)

Material Description

GRAY Silt with sand(Sandy loam USDA)

Atterberg Limits

PL= LL= PI=

Coefficients

D_{85}= 0.232 D_{60}= 0.0635 D_{50}= 0.0543
D_{30}= 0.0237 D_{15}= 0.0060 D_{10}= 0.0043
C_u= 14.93 C_c= 2.08

Classification

USCS= ML AASHTO= A-4(0)

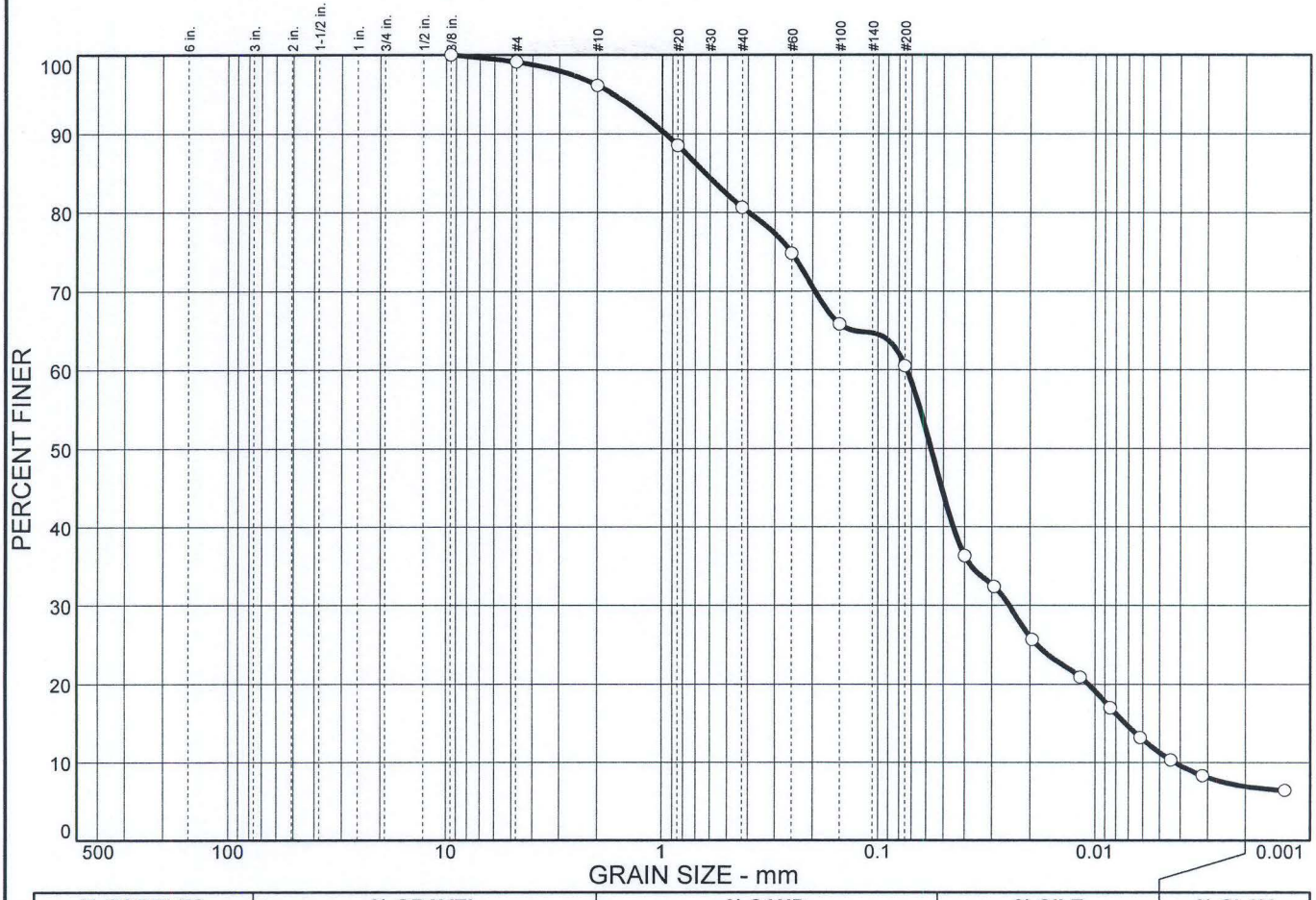
Remarks

Sample No.: 11.2.11 #3 **Source of Sample:** **Date:** 11.7.11
Location: **Elev./Depth:**

PENNIMAN & BROWNE, INC.

Client: EXIDE TECHNOLOGIES
Project: N/A
Project No: 201104484 **Figure**

Particle Size Distribution Report



% COBBLES	% GRAVEL	% SAND	% SILT	% CLAY
0.0	3.9	49.5	39.7	6.9

SIEVE SIZE	PERCENT FINER	SPEC.* PERCENT	PASS? (X=NO)
.375 in.	100.0		
#4	99.1		
#10	96.1		
#20	88.5		
#40	80.6		
#60	74.8		
#100	65.8		
#200	60.5		

* (no specification provided)

Material Description

GRAY Sandy silt(Sandy loam USDA)

Atterberg Limits

PL= LL= PI=

Coefficients

D_{85}= 0.633 D_{60}= 0.0737 D_{50}= 0.0571
D_{30}= 0.0250 D_{15}= 0.0072 D_{10}= 0.0043
C_u= 17.33 C_c= 1.99

Classification

USCS= ML AASHTO= A-4(0)

Remarks

Sample No.: 11.2.11 #4 **Source of Sample:** **Date:** 11.7.11
Location: **Elev./Depth:**

PENNIMAN & BROWNE, INC.

Client: EXIDE TECHNOLOGIES
Project: N/A
Project No: 201104484 **Figure**

From:	Wessel, Tamera
To:	James Capp; CARTER, Steve
Subject:	Applicant review for Title V Renewal No. T035-45333-00028 for Garfield Facility LLC
Date:	Thursday, February 9, 2023 9:35:00 AM
Attachments:	image001.png image002.png image004.png image005.png image006.png image007.png image008.png image009.png 45333ATSDcalcs.xlsx 45333per.docx 45333ATSD.docx image003.png

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Mr. Carter and Mr. Capp,

Attached are the updated permit, Addendum to the Technical Support Document (ATSD), and ATSD Calculations for your review.

The most notable points of concern resulting from the public comments are listed below:

- Calculations were updated to reflect the solvent used with the parts washers are exempt for VOC.
- Compliance determination and monitoring requirements along with record keeping requirements were included for the fabric filters in use with the soda ash silos.

These items are being provided for a quick review before they will be sent on to the next step of the permitting process.

Tamera Wessel
Environmental Engineer 2

(317) 234-8530 • TWessel@idem.IN.gov

www.idem.IN.gov

Scan the QR code to leave your feedback.

We appreciate your input!

From:	James Capp
To:	Wessel, Tamera
Cc:	Lacey CHITWOOD; Stephen BENNETT; Steve CARTER; Chuck GIESIGE; Mike CASPER
Subject:	Applicant review for Title V Renewal No. T035-45333-00028 for Garfield Facility LLC
Date:	Wednesday, February 15, 2023 4:56:47 PM

Tamera,

Thank you for providing Garfield Facility LLC an opportunity to review the updated draft Title V permit renewal. In regard to new conditions D.3.8(c) and D.3.11(d), we do not believe that it is appropriate or necessary to add pressure drop monitoring for these fabric filters. Currently, we do not have pressure drop gauges installed on the units. Therefore, we would have to install pressure drop gauges in order to comply with the new permit conditions. We do, however, always ensure that the fabric filters are in operation when product is being loaded into the silo. These fabric filters are not like the other ones onsite as they do not have a fan associated with them and the only time they have any measurable air flow (and pressure drop) is when product is being loaded into the silo.

In the previous Title V permits, IDEM determined that no additional monitoring on the soda ash silos was necessary to provide a reasonable assurance of compliance with the applicable emission limits. Given the nature of this operation, as described above, we believe that this was an appropriate and correct conclusion. As such, we recommend that new conditions D.3.8(c) and D.3.11(d) not be included in the final permit.

If IDEM believes some parametric monitoring is required by the regulations, then a weekly visible emissions check when the silo is being loaded would be significantly more appropriate than pressure drop monitoring for these control devices. And, consistent with IDEM's approach for other parametric monitoring, a finding of some visible emissions should not be a deviation from the permit. Failure to take response steps after seeing visible emissions would be considered a deviation from this permit.

Thank you again for allowing us to provide feedback on this issue. If you have any questions, please don't hesitate to reach out to us.

James Capp, Environmental Compliance Director

From: Stephen BENNETT
To: Wessel, Tamera; James Capp
Cc: Lacey CHITWOOD; Steve CARTER; Chuck GIESIGE; Mike CASPER
Subject: Re: Applicant review for Title V Renewal No. T035-45333-00028 for Garfield Facility LLC
Date: Friday, February 24, 2023 9:29:07 AM

I have a few questions.

1. Are the soda ash silos located outdoors? **YES**
2. Does each silo have their own filter? **YES**
3. How often are the silos loaded? **SCRUBBER SILO FILLED DAILY AND THE 2 BREAKER SILOS FILLED APPROXIMATELY 1X MON-FRI**

After review, IDEM will not require pressure drop readings, but will require a form of monitoring to assure the control is working properly. Would Garfield be able to do quarterly filter inspections? Or, would you prefer daily (rather than weekly as suggested) visible emissions checks? Days the silos are not in use/loaded would just require a "not in use" entry for the visible emission recording. **YES, QUARTERLY FILTER INSPECTIONS WILL WORK.**

Element Resources

Stephen Bennett
Environmental Coordinator
ELEMENT RESOURCES

W + 1 765 747 9980 EXT 137 **C** + 1 765 808 1939
2601 W. MT Pleasant blvd
Muncie, Indiana 47302
United States

From: Wessel, Tamera <TWessel@idem.IN.gov>
Sent: Tuesday, February 21, 2023 11:14 AM
To: James Capp <james.capp@motrexllc.com>
Cc: Lacey CHITWOOD <lacey.chitwood@motrexllc.com>; Stephen BENNETT <stephen.bennett@elementrellc.com>; Steve CARTER <steve.carter@elementrellc.com>; Chuck GIESIGE <chuck.giesige@elementrellc.com>; Mike CASPER <mike.casper@motrexllc.com>
Subject: RE: Applicant review for Title V Renewal No. T035-45333-00028 for Garfield Facility LLC

I had attempted to send this to Mr. Capp, but received notice that he is away until the 24th. In his place, would someone be able to comment on the following so that the permitting process can proceed?

I have a few questions.

1. Are the soda ash silos located outdoors?
2. Does each silo have their own filter?
3. How often are the silos loaded?

After review, IDEM will not require pressure drop readings, but will require a form of monitoring to assure the control is working properly. Would Garfield be able to do quarterly filter inspections? Or, would you prefer daily (rather than weekly as suggested) visible emissions checks? Days the silos are not in use/loaded would just require a "not in use" entry for the visible emission recording.

Tamera Wessel

From: James Capp <james.capp@motrexllc.com>
Sent: Wednesday, February 15, 2023 4:57 PM
To: Wessel, Tamera <TWessel@idem.IN.gov>
Cc: Lacey CHITWOOD <lacey.chitwood@motrexllc.com>; Stephen BENNETT <stephen.bennett@elementrellc.com>; Steve CARTER <steve.carter@elementrellc.com>; Chuck GIESIGE <chuck.giesige@elementrellc.com>; Mike CASPER <mike.casper@motrexllc.com>
Subject: Applicant review for Title V Renewal No. T035-45333-00028 for Garfield Facility LLC

Tamera,

Thank you for providing Garfield Facility LLC an opportunity to review the updated draft Title V permit renewal. In regard to new conditions D.3.8(c) and D.3.11(d), we do not believe that it is appropriate or necessary to add pressure drop monitoring for these fabric filters. Currently, we do not have pressure drop gauges installed on the units. Therefore, we would have to install pressure drop gauges in order to comply with the new permit conditions. We do, however, always ensure that the fabric filters are in operation when product is being loaded into the silo. These fabric filters are not like the other ones onsite as they do not have a fan associated with them and the only time they have any measurable air flow (and pressure drop) is when product is being loaded into the silo.

In the previous Title V permits, IDEM determined that no additional monitoring on the soda ash silos was necessary to provide a reasonable assurance of compliance with the applicable emission limits. Given the nature of this operation, as described above, we believe that this was an appropriate and correct conclusion. As such, we recommend that new conditions

D.3.8(c) and D.3.11(d) not be included in the final permit.

If IDEM believes some parametric monitoring is required by the regulations, then a weekly visible emissions check when the silo is being loaded would be significantly more appropriate than pressure drop monitoring for these control devices. And, consistent with IDEM's approach for other parametric monitoring, a finding of some visible emissions should not be a deviation from the permit. Failure to take response steps after seeing visible emissions would be considered a deviation from this permit.

Thank you again for allowing us to provide feedback on this issue. If you have any questions, please don't hesitate to reach out to us.
James Capp, Environmental Compliance Director

From:	Luke Johnstone
To:	Wessel, Tamera
Cc:	John Mundell; Rachel Walker; Brad Bookout
Subject:	Public Comment T035-45333-00028 Garfield Facility, LLC
Date:	Friday, January 13, 2023 11:24:15 AM
Attachments:	image005.png image010.png image011.png image012.png image013.png image014.png image015.png image016.png M21013 Garfield T035-45333-00028 Comments 01.13.2023_Final.pdf

Ms. Wessel,

On behalf of the Delaware County Redevelopment Commission, please find the attached letter with comments regarding the **Part 70 Operating Permit No. T035-45333-00028** for Garfield Facility, LLC. At your earliest convenience, could you please confirm that you have received our comments?

Please do not hesitate to contact us if you have any questions.

Respectfully submitted,

Mundell
Consulting Professionals for the Earth and the Environment
110 S. Downey Ave.
Indianapolis, IN 46219

Luke J. Johnstone, P.E.
Project Environmental Engineer

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317-340-9468
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110 South Downey Avenue, Indianapolis, Indiana 46219-6406
Telephone 317-630-9060, Facsimile 317-630-9065
www.MundellAssociates.com

January 13, 2023

Tamera Wessel
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

Re: **Garfield Facility, LLC**
Preliminary Findings
Part 70 Operating Permit Renewal
Permit No. T035-45333-00028
Public Comments
2601 West Mount Pleasant Boulevard
Muncie, Delaware County, Indiana 47302
MUNDELL Project No. M21013

Dear Ms. Wessel:

On behalf of the Delaware County Redevelopment Commission (Delaware County), Mundell & Associates, Inc. (MUNDELL) is submitting comments regarding the renewal of the Part 70 Operating Permit No. T035-45333-00028 as referenced above. Below is a list of comments, concerns, and requests for further clarification regarding the DRAFT Part 70 Operating Permit renewal and Technical Support Document (TSD).

Project Description

It is our understanding that Garfield Facility, LLC (GARFIELD) has applied to renew its Part 70 Operating Permit for the facility location in Muncie, IN. The source is subject to 40 CFR 63, Subpart X, Secondary Lead Smelting, which requires it to be permitted as a Title V source and obtain a Part 70 Operating Permit Renewal. The renewal permit indicates that the facility does not have any new equipment that would emit air pollutants. However, a few items were updated in this renewal permit, and MUNDELL has identified several issues or concerns with the proposed renewal permit. As such, MUNDELL has prepared the following list of comments and questions in order to better understand the proposed changes and any potential environmental concerns pertaining to the renewal permit.

Compliance Monitoring Requirements

The renewal permit indicated compliance monitoring requirements were being removed.

MUNDELL identified the following issues which, if clarified, would provide additional assurance that the facility will have adequate monitoring to assure permit compliance:

1) **Visible Emissions Notations:** As noted on page 24-25 of the Technical Support Document (TSD), visible emission notations requirements for the North and South sodium carbonate packed tower scrubber stack exhaust and a venturi scrubber stack exhaust have been removed (*i.e.*, Section D.1.8 and D.3.7 have been removed from the previous permit (IDEM virtual File Cabinet document number 80585636)). In addition, record keeping associated with these visible emission notations have been removed (*i.e.*, Section D.1.13(a) and D.3.12(a) have been removed from the previous permit). The renewal permit indicates that these visible emission notations requirements were removed due to "*current IDEM standards*" which "*require only one form of compliance monitoring*". However, no specific IDEM standard is cited. For clarity purposes, could IDEM please provide the specific "IDEM standard" which specifies that only one form of compliance monitoring is required?

   In addition, the previous permit indicated visible emission notations were required based on 326 IAC 2-7-6(1) and 326 IAC 2-7-5(1). The former code (326 IAC 2-7-6(1)) indicates that a Part 70 permit shall contain sufficient compliance monitoring and record keeping to assure compliance with the terms and conditions of the permit. It would appear that IDEM is not necessarily limited to requiring one form of compliance monitoring and may require additional monitoring as it deems appropriate to assure compliance. It appears that upon the issuance of the previous 2018 permit, IDEM had deemed it necessary to include visible emission notations requirements to assure compliance. What has changed to warrant IDEM's decision to remove this monitoring requirement? Is the "current IDEM standard" requiring only one form of monitoring cited in this draft renewal permit a new requirement since the last permit? Alternatively, is there new information since the last permit which offers more confidence that compliance will be obtained even with the removal of this monitoring requirement? It is MUNDELL's opinion that the visible emission notations requirements be kept in as part of this renewal permit to ensure sufficient compliance monitoring and reporting of this facility.

2) **Opacity:** Section C.2 along with 326 IAC 20-13-.1-10(a) cited in Attachment F of the renewal permit specifies certain opacity limitations. However, it is not clear what compliance monitoring or record keeping is included in the permit to assure such requirements are satisfied. For clarity purposes, could IDEM please clarify which compliance monitoring and recording keeping requirements included in the renewal permit provide sufficient information to assure compliance with these

permitting terms and conditions?

Compliance Determination Requirements

In reviewing the Compliance Determination Requirements sections for Particulate Matter (PM), Lead (Pb), and Sulfur Dioxide (if applicable) (Sections D.1.6, D.2.4, and D.3.5), MUNDELL noted that the permit specifies that the baghouse "*shall be in operation at all times*" for each respective emission unit. Moreover, as indicated on page 20-21 of the TDS, the Federal Consent Decree requires that the RLS baghouse shall be in use "*at all times that the RLS Line is operating*." As such, it would appear that these emission units that have a baghouse shall be in operation only if the baghouse is functioning. Yet in each applicable section of the Compliance Determination Requirements, it specifies that

> "*In the event that bag failure is observed in a multi-compartment baghouse, if operations continue for* ***ten (10) days or more after the failure*** *is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify IDEM, Office of Air Quality of the expected date the failed units will be repaired or replaced…*"

Based on this requirement, it appears that the permit allows for the operation of these emission units for up to ten (10) days with a failed baghouse. Given the multiple requirements stating that a baghouse for these emission units "*shall*" be in use "*at all times*", and given the Potential to Emit (PTE) for this facility is near the allowable limit assuming all control devices are functioning 100% of the time, it would appear that any timeframe when the baghouses are not in operation would constitute an emergency situation and should, at minimum, be treated as such (per section B.11 of the permit). Moreover, as indicated on page 20-21 of the TDS, the Federal Consent Decree requires Garfield "*…shall take immediate corrective actions addressing any pressure drop deviation…*" of the RLS Line baghouse. As such, it would appear that, for at least the RLS Line baghouse, under no circumstance should the RLS line continue to operate for any significant amount of time (let alone ten (10) days) with a failed baghouse as this would imply that corrective action was not immediately taken.

Could IDEM please clarify the following:

1) Why any timeframe for an emission unit to operate with a failed baghouse is apparently allowed given the multiple conditions which state the process baghouses "*shall be in operation at all times*" that emission units are in operation;
2) Why any timeframe for an emission unit to operate with a failed baghouse without treating it as an emergency is apparently allowed (in terms of emergency reporting requirements and expected action); and
3) How the timeframe of ten (10) days was determined as a reasonable timeframe to

allow the operation of the emission unit with a failed baghouse prior to repairing or replacing the baghouse. Ideally, supporting calculations in justifying this timeframe would be expected.

Please update the renewal permit accordingly or clarify these discrepancies for increased permit transparency.

Further Permit Modification Clarification

In review of changes or updates to this renewal permit as compared to the previous permit, MUNDELL identified the following additional issues which would be beneficial to clarify:

1) **Cold Cleaning Degreasing Operations:** The renewal permit indicates that 326 IAC 8-3-2 no longer applies to the cold cleaning degreasing operations, and that 326 IAC 8-3 does not apply because the degreasers do not use a volatile organic compound (VOC) containing solvent. It appears that these rules and all associated permit conditions did apply to the previous permit, which stated on page 19 of the TSD that the two (2) parts washers did meet the definition of cold cleaning degreasers and did utilize organic solvent containing VOCs.

   Comparison of the emission calculations for the two (2) parts washers (page 14 of Appendix A in the renewal permit TSD and page 13 of Appendix A in the previous permit TSD) indicates that the exact same solvent with a 100% VOC content is being used. As such, it would appear it is not appropriate to remove all requirements and conditions related to 326 IAC 8-3 in this renewal permit as there has been no apparent change in the solvent use and/or in cold degreasing operations. Please update the renewal permit accordingly or clarify this discrepancy for increased permit transparency.

2) **Section D.2.2 Particulate Emissions:** In the previous permit, Section D.2.2 included calculated process weight rates and emission limitations for particulate emissions for both Pig Castings and Pot Furnaces. In the renewal permit, calculated process weight rate and emission limitations were not included in Section D.2.2 for Pot Furnaces. It is not clear why these calculations were omitted for Pot Furnaces in the renewal permit as compared to the previous permit considering these Pot Furnaces appear to be operating in a similar fashion in both permits. Please update the renewal permit accordingly or clarify this discrepancy for increased permit transparency.

Particulate Emissions

In review of Particulate Matter (PM) Potential to Emit (PTE) calculations, MUNDELL

identified the following issues which would be beneficial to clarify:

1) **Fabric Filter – Soda Ash Wash and 3 Silos:** It appears that the PM PTE for the Soda Ash Pneumatic Conveying through three (3) silos is controlled by fabric filters. Please clarify the following:

    a. The control efficiency of the fabric filters is not listed on page 6 of Appendix A of the TSD. Please clarify what the control efficiency of the fabric filter is along with the reference or documentation confirming the assumed efficiency.

    b. Section D.3 indicates venturi scrubbers, the fabric filters of these Soda Ash Wash conveying systems, and bin room baghouses are required to render Prevention of Significant Deterioration (PSD) not applicable (see Section D.3.1). The subsequent Compliance Determination Requirements (Sections D.3.5 – D.3.6), Compliance Monitoring Requirements (Sections D.3.7 – D.3.8), and Record Keeping Requirements (D.3.11) include no monitoring or record keeping requirements for these fabric filters to assure compliance with the permit's terms and conditions. Regardless of the quantity of emissions, these fabric filters are required to render PSD not applicable and without any monitoring and reporting requirements linked to these fabric filters, there is no way to track that these fabric filters are functioning as presented in the permit. Moreover, it appears 326 IAC 2-7-6(1) requires that compliance certification, testing, monitoring, reporting, and record keeping is required to some degree to assure compliance with the permit's terms and conditions. Please update the renewal permit accordingly or clarify this discrepancy for increased permit transparency.

2) **Fugitive Dust Emissions:** Regarding the fugitive dust emissions calculations (pages 15-21 of Appendix A of the TSD) MUNDELL identified the following issues:

    a. *Silt Loading Value:* It appears the fugitive dust calculations were separated mainly based on road type and varying silt loading values (sL). The cited silt loading value used in the calculations for each scenario is apparently based on a site-specific source sample.

        i. For public transparency, please provide the documentation for the testing methodology and results that determined these site-specific silt loading values.

        ii. Please indicate under what conditions these silt loading values apply, and what requirements are in place to ensure that these silt loading values will remain accurate into the future. For example, what

degree of pavement up-keep is necessary to ensure these values do not change over time?

b. *Road Area Clarity:* Calculations presented on page 15 through 18 of Appendix A of the TDS separate paved roads by "sector" with each having a different silt loading factor. It is not clear how these "sectors" and corresponding silt loading factors are distributed across the property. For instance, review of Google Earth Imagery seems to indicate that there is one (1) drive entryway into the facility. As such, it would appear all vehicles included on "Sectors 1-4" would enter in this roadway, and thus should have the same silt loading factor for at least a portion of their drive. Please clarify this discrepancy to ensure the fugitive dust emissions are accurately and/or most conservatively estimated. In addition, a map clearly illustrating which portions of paved surfaces correspond to the respective silt loading factors would be most beneficial.

Summary and Conclusions

On behalf of Delaware County and in response to the 30-day period for public comment on Part 70 Operating Permit No. T035-45333-00028, MUNDELL respectively submits the aforementioned comments.

We appreciate the opportunity to provide these comments. If you should have any questions regarding the attached, please do not hesitate to contact the undersigned at 317-630-9060, or Ljohnstone@MundellAssociates.com or rwalker@MundellAssociates.com.

Sincerely,
MUNDELL & ASSOCIATES, INC.

Stephanie Burdsall
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Principal Geologist

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President/Senior Environmental Consultant

/ljj

BILLING WORKSHEET

TV Permits

For Applications Received On and After October 1, 2019

Permit #: 035-45333-00028

Permit Reviewer: Tamera Wessel

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).

TV Fees			
☐		$793	TV MSM (45)
☐		$5,556	TV NSC (Minor PSD/EO) (120)
☐		$9,525	TV NSC (Major PSD/EO) (270)
☐		$5,556	TV SSM (Minor PSD/EO) (120)
☐		$9,525	TV SSM (Major PSD/EO) (270)
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" worksheet tab 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			
☐		$793	Interim – Any type
☐		$793	Public Hearing

PSD BACT or LAER Review			
☐		$4,762	2 to 5 Review Analyses
☐		$9,525	6 to 10 Review Analyses
☐		$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
☐		$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: Garfield Facility LLC

TEMPO AI: 14708

Permit #: 035-45333-00028

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: