September 27, 2019

Dear Interested Party:

Re: Draft Hazardous Waste Management Operating Permit Renewal
Vertellus Integrated Pyridines LLC
Indianapolis, Indiana
IND000807107

The Indiana Department of Environmental Management (IDEM) is inviting public comments on the draft permit renewal for Vertellus Integrated Pyridines LLC to operate a hazardous waste storage and treatment facility at 1500 S Tibbs Ave., Indianapolis, Indiana. Enclosed is a copy of the public notice that appeared on September 27, 2019 in the Indianapolis Star.

The draft permit specifies the conditions under which the facility must manage hazardous waste in order to maintain compliance with Indiana rules, 329 IAC 3.1, and Federal rules, 40 CFR Part 264. The draft permit is available for public inspection at the Indianapolis-Marion County Public Library, Central Library, 40 E. St. Clair St., Indianapolis, and can also be accessed via IDEM's Virtual File Cabinet (VFC). The enclosed fact sheet includes instructions to access the permit application and draft permit using VFC.

Comments must be postmarked by November 12, 2019 and should be sent to Ms. Paula Bansch at pbansch@idem.IN.gov or the following address:

Indiana Department of Environmental Management
Office of Land Quality
Hazardous Waste Permit Section
IGCN 1101
100 North Senate Avenue
Indianapolis, IN 46204

Before taking final action on the permit application, IDEM will give full consideration to all significant and relevant comments regarding this permit decision.

Sincerely,

Rebecca Eifert Joniskan
Rebecca Eifert Joniskan, Chief
Permits Branch
Office of Land Quality
NOTICE OF 45-DAY PUBLIC COMMENT PERIOD

On September 27, 2019 the Indiana Department of Environmental Management (IDEM) Hazardous Waste Permits Section issued a draft decision for a renewal of a hazardous waste operating permit for Vertellus Integrated Pyridines LLC at 1500 S. Tibbs Ave., Indianapolis. The draft decision proposes to allow Vertellus to renew a permit for an existing facility for the storage and treatment of hazardous waste. The application, IDEM’s draft decision, and draft risk assessment are available at:

Indianapolis-Marion County Public Library, Central Library
40 E. St. Clair Street, Indianapolis, IN

The application, draft decision, and draft risk assessment are also available online via IDEM’s Virtual File Cabinet (VFC). Please go to: http://vfc.idem.in.gov. You will then have the option to search for these documents using a variety of criteria. You are invited to comment during the public comment period. You also may request IDEM hold a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below by November 12, 2019, email is preferred. If you do not want to comment at this time, but would like to receive notice of future action related to this application, please contact IDEM at the address below. Please refer to RCRA Facility ID IND000807107 in all correspondence. Comments should be sent to:

Paula Bansch
IDEM, OLQ, 100 North Senate Ave., IGCN 1154, Indianapolis, IN 46204-2251
(800) 451-6027
Or dial directly: (317) 232-3243
Fax: (317) 232-3403 attn: Paula Bansch
E-mail: pbansch@idem.IN.gov

For additional information please see the application.

Following the end of the public comment period, IDEM will issue a Notice of Decision (NOD) stating whether the permit renewal request has been issued or denied. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive the NOD. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available online via the VFC, at the address indicated above.
September 27, 2019

The Indiana Department of Environmental Management (IDEM) has prepared this fact sheet to inform the public of the process involved in issuing a Hazardous Waste Management Permit Renewal to Vertellus Integrated Pyridines LLC (Vertellus).

IDEM administers the hazardous waste permit program and related requirements in Indiana. Any facility that treats, stores, and/or disposes of hazardous waste in Indiana is required to obtain a hazardous waste management permit. In addition, any hazardous waste facility receiving a permit is required to provide corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit on-site.

Facility Description

Vertellus operates a hazardous waste storage and treatment facility at 1500 South Tibbs Avenue, Indianapolis. The facility is primarily a manufacturer of synthetic pyridine derivatives, manufactured for sale to other industries as chemical intermediates to be used by these industries in the manufacture of pharmaceutical and agricultural products, as well as cosmetics and other products. The facility stores and treats hazardous waste on-site, as well as uses hazardous waste as a fuel in three on-site boilers.

IDEM’s Role

IDEM staff review the permit application, prepare the draft permit and the public notice, respond to any comments received during the public comment period, and issue the final permit decision. The permit contains the following items:

Permit Conditions

I. Standard Conditions: These conditions are of a general nature and are required for all facilities that manage hazardous waste under a Hazardous Waste Permit.

II. General Facility Conditions: These conditions are also general in nature and are required for all facilities, but are more specific in determining operating requirements.
III. Tank Storage Conditions: These conditions include waste identification, tank location and design, operating requirements, secondary containment, and inspection requirements.

IV. Boiler Conditions: These conditions are specific requirements concerning boiler operation. These conditions include facility maintenance, performance standards, limitations on wastes, operation conditions, and closure requirements.

V. Air Emission Standard Conditions: These conditions address compliance with 40 CFR Part 264, Subpart BB, for air emissions from equipment at hazardous waste facilities.

VI. Corrective Action Conditions: These conditions provide for the investigation and remediation of any releases from a Solid Waste Management Unit (SWMU) or Area of Concern (AOC). These conditions also require owners and operators to provide information, including sampling results, to IDEM to support whether or not a release has occurred.

VII. Waste Codes: This condition contains a list of the hazardous waste codes the facility is permitted to store in tanks and treat in the boilers.

VIII. Compliance Schedule Conditions: These conditions specify a schedule leading to compliance with the Indiana Hazardous Waste Rules.

Permit Attachments
Attachment A - Part A Application: The Part A Application details the facility location, ownership, U.S. EPA identification number, type of business, type and quantity of hazardous waste managed and the type of hazardous waste management units at the facility.

Attachment B - Facility Description: This attachment provides general information regarding the site and surrounding land.

Attachment C - Waste Characteristics/Waste Analysis Plan: This attachment contains the Waste Analysis Plan, which describes, in detail, the procedures to be used by the facility to identify the hazardous wastes to be handled on-site. The Plan includes regulatory analytical methods, procedures for physical waste identification, and procedures to ensure the proper acceptance of off-site waste.

Attachment D - Process Information: This attachment describes, in detail, the management practices the facility will utilize to ensure safe and proper storage of hazardous waste in tanks, and the treatment of waste in the boilers. The Plan includes handling procedures, inspection procedures and schedules, and secondary containment requirements.

Attachment E - Ground Water Monitoring: Ground water monitoring is not required for this facility. Therefore there is no Attachment E.

Attachment F - Procedures to Prevent Hazards: This attachment contains the security measures, and preparedness and prevention procedures to ensure the safety of the workers on-site, as well as to prevent unauthorized access. This section is closely related to the Contingency Plan and Inspection Plan.
Attachment G - Contingency Plan: The Contingency Plan describes the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water at the facility.

Attachment H - Personnel Training: This attachment describes the training requirements for personnel working with hazardous waste at the facility.

Attachment I - Closure Plan: The Closure Plan describes, in detail, the activities and procedures required to ensure that the hazardous waste management units have been closed in accordance with 329 IAC 3.1. This attachment also describes the hazardous constituents of concern and the clean-up levels.

Attachment J - Corrective Action for Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs): This attachment provides a comprehensive list of SWMUs and AOCs identified at the facility, and describes the facility's obligation to notify IDEM of new SWMUs and AOCs, including information pertaining to releases of hazardous waste(s) and hazardous constituents from these units. This attachment includes the Corrective Action Scope of Work that the facility will follow to conduct investigations, produce reports, and ensure the adequate remediation of all releases at and from the facility. It also contains a facility map showing the locations of all SWMUs and AOCs.

Public Participation
The public comment period for this operating permit renewal and draft risk assessment began on September 27, 2019, when the official public notice was published in the Indianapolis Star, Indiana. Written comments must be postmarked or emailed by November 12, 2019.

You may request IDEM hold a public hearing. At a hearing, you would have an opportunity to submit written comments, ask questions, make statements, and otherwise discuss any concerns about the permit with IDEM staff. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing/meeting 30 days in advance.

Copies of the draft permit and draft risk assessment are available for public review at the Indianapolis-Marion County Public Library, Central Library, 40 E. St. Clair St., Indianapolis, Indiana, and via IDEM's Virtual File Cabinet (VFC) at: www.IN.gov/IDEM and select "eServices" under "Resources". From this website, you can access the document search page (http://vfc.idem.in.gov/). Enter the document numbers in the upper right corner of the VFC document search page.

VFC permit document numbers are:

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<th>Risk Assessment</th>
<th>Draft Permit Conditions</th>
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Direct questions or comments to:

Paula Bansch
Indiana Department of Environmental Management
Office of Land Quality
Hazardous Waste Permit Section
IGCN 1101
100 North Senate Avenue
Indianapolis, IN 46204

(317) 232-3243 or pbansch@idem.in.gov