NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a Federally Enforceable State Operating Permit (FESOP) for Insituform Technologies, Inc. in Marion County

FESOP Renewal No.: F097-43151-00585

The Indiana Department of Environmental Management (IDEM) has received an application from Insituform Technologies, Inc. located at 2130 Stout Field West Drive, Indianapolis, Indiana 46241 for a renewal of its FESOP issued on March 24, 2011. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Insituform Technologies, Inc. to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

A copy of the permit application and IDEM’s preliminary findings have been sent to:

West Indianapolis Branch Library
1216 South Kappes Street
Indianapolis, IN 46221

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, 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. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you
do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F 097-43151-00585 in all correspondence.

Comments should be sent to:

Hachem Ismaili Alaoui
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Hachem Ismaili Alaoui or (317) 232-2827
Or dial directly: (317) 232-2827
Fax: (317) 232-6749 attn: Hachem Ismaili Alaoui
E-mail: HIAlaoui@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. 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 a Notice of the Decision. 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 on the Internet at the address indicated above and will also be sent to the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Hachem Ismaili Alaoui of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality
Federally Enforceable State Operating Permit Renewal

Insituform Technologies, Inc.
2130 Stout Field West Drive
Indianapolis, Indiana 46241

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: 097-43151-00585
Master Agency Interest ID: 13486

Issued by: Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Issuance Date:
Expiration Date:
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SECTION A  SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1  General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary flexible pipeline liner manufacturing facility.

Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
General Source Phone Number: 636-530-8000
SIC Code: 1623 (Water, Sewer, Pipeline, and Communications and Power Line Construction)
County Location: Marion (Wayne Township)
Source Location Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit Program

A.2  Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Four (4) static mixers, using cured in place pipe (CIPP) wetout process, using no control, as follow:

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Year Constructed</th>
<th>Maximum Capacity Throughput of liquid Resin (tons/hour)</th>
<th>Exhausting Bays</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 1</td>
<td>2006</td>
<td>9</td>
<td>0, 1, 2, 6, 2R, and 6R</td>
</tr>
<tr>
<td>Mixer 2</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mixer 3</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mixer 4</td>
<td>2012</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>36</td>
<td>--</td>
</tr>
</tbody>
</table>

(b) One (1) static mixer, identified as Mixer 5, constructed in 2008, using integral lining system (ILS) wetout process, with a maximum throughput capacity of 9 tons per hour of liquid resin, using no control, and exhausting to bays 0, 1, 2, 6, 2R, and 6R.

(c) Four (4) wetout conveyors, using cured in place pipe (CIPP) wetout process, using no control, as follow:

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Year Constructed</th>
<th>Maximum Capacity Throughput of liquid Resin (tons/hour)</th>
<th>Exhausting Bays</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conveyor 1</td>
<td>2006</td>
<td>9</td>
<td>0, 1, 2, 6, 2R, and 6R</td>
</tr>
<tr>
<td>Conveyor 2</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Conveyor 3</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Conveyor 4</td>
<td>2012</td>
<td>9</td>
<td></td>
</tr>
</tbody>
</table>
(d) One (1) wetout conveyor, identified as Conveyor 5, constructed in 2008, using integral lining system (ILS) wetout process, with a maximum throughput capacity of 9 tons per hour of liquid resin, using no control, and exhausting to bays 0, 1, 2, 6, 2R, and 6R.

(e) One (1) scrap resin building, identified as Scrap 1, constructed in 2006, with a maximum capacity of 50 tons per year, using no control, and exhausting to stack 9.

(f) Eight (8) liquid resin storage tanks, identified as Tanks 1 through 8, constructed in 2006, each with a maximum storage capacity of 5,880 gallons and maximum throughput capacity of 1,800 gallons per hour, containing no more than 45 percent styrene by weight, using no control, and exhausting to stacks 1 through 8, respectively. These tanks are insulated and temperature cooled.

(g) One (1) fugitive area, identified as Fugitive 1, constructed in 2006, consisting of 36 valves, 8 pumps, and 100 flanges.

A.3 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
(a) This permit, 097-43151-00585, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The
PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

1. An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

2. The permitted facility was at the time being properly operated;

3. During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

4. For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865

5. For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

   Indiana Department of Environmental Management
   Compliance and Enforcement Branch, Office of Air Quality
   100 North Senate Avenue
   MC 61-53 IGCN 1003
   Indianapolis, Indiana 46204-2251

   within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;
(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to 097-43151-00585 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,
(2) revised, or
(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.
(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:
(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,
Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;
(B) Removal or demolition contractor; or
(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]
The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any
monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]**

**C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]**

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]**

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:
(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

1. initial inspection and evaluation;
2. recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
3. any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

1. monitoring results;
2. review of operation and maintenance procedures and records; and/or
3. inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring
sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

(a) Four (4) static mixers, using cured in place pipe (CIPP) wetout process, using no control, as follow:

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Year Constructed</th>
<th>Maximum Capacity Throughput of liquid Resin (tons/hour)</th>
<th>Exhausting Bays</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 1</td>
<td>2006</td>
<td>9</td>
<td>0, 1, 2, 6, 2R, and 6R</td>
</tr>
<tr>
<td>Mixer 2</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mixer 3</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mixer 4</td>
<td>2012</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>36</strong></td>
<td><strong>--</strong></td>
</tr>
</tbody>
</table>

(b) One (1) static mixer, identified as Mixer 5, constructed in 2008, using integral lining system (ILS) wetout process, with a maximum throughput capacity of 9 tons per hour of liquid resin, using no control, and exhausting to bays 0, 1, 2, 6, 2R, and 6R.

(c) Four (4) wetout conveyors, using cured in place pipe (CIPP) wetout process, using no control, as follow:

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Year Constructed</th>
<th>Maximum Capacity Throughput of liquid Resin (tons/hour)</th>
<th>Exhausting Bays</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conveyor 1</td>
<td>2006</td>
<td>9</td>
<td>0, 1, 2, 6, 2R, and 6R</td>
</tr>
<tr>
<td>Conveyor 2</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Conveyor 3</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Conveyor 4</td>
<td>2012</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>36</strong></td>
<td><strong>--</strong></td>
</tr>
</tbody>
</table>

(d) One (1) wetout conveyor, identified as Conveyor 5, constructed in 2008, using integral lining system (ILS) wetout process, with a maximum throughput capacity of 9 tons per hour of liquid resin, using no control, and exhausting to bays 0, 1, 2, 6, 2R, and 6R.

(e) One (1) scrap resin building, identified as Scrap 1, constructed in 2006, with a maximum capacity of 50 tons per year, using no control, and exhausting to stack 9.

(f) Eight (8) liquid resin storage tanks, identified as Tanks 1 through 8, constructed in 2006, each with a maximum storage capacity of 5,880 gallons and maximum throughput capacity of 1,800 gallons per hour, containing no more than 45 percent styrene by weight, using no control, and exhausting to stacks 1 through 8, respectively. These tanks are insulated and temperature cooled.

(g) One (1) fugitive area, identified as Fugitive 1, constructed in 2006, consisting of 36 valves, 8 pumps, and 100 flanges.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limits for VOC and HAP [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

CIPP wetout process:
(a) The annual resin throughput to the CIPP wetout process consisting of the following shall be limited to less than 8,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month:

<table>
<thead>
<tr>
<th></th>
<th>Mixer 1</th>
<th>Mixer 2</th>
<th>Mixer 3</th>
<th>Mixer 4</th>
<th>Conveyor 1</th>
<th>Conveyor 2</th>
<th>Conveyor 3</th>
<th>Conveyor 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOC</td>
<td>0.24</td>
<td>0.24</td>
<td>0.24</td>
<td>0.24</td>
<td>0.057</td>
<td>0.057</td>
<td>0.057</td>
<td>0.057</td>
</tr>
<tr>
<td>HAP</td>
<td>0.24</td>
<td>0.24</td>
<td>0.24</td>
<td>0.24</td>
<td>0.057</td>
<td>0.057</td>
<td>0.057</td>
<td>0.057</td>
</tr>
</tbody>
</table>

(b) The VOC and HAP emissions from the following CIPP wetout process shall not exceed the limits as specified below:

<table>
<thead>
<tr>
<th>CIPP wetout process</th>
<th>VOC (lb/ton of resin throughput)</th>
<th>Single HAP (Styrene) (lb/ton of resin throughput)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 1</td>
<td>0.24</td>
<td>0.24</td>
</tr>
<tr>
<td>Mixer 2</td>
<td>0.24</td>
<td>0.24</td>
</tr>
<tr>
<td>Mixer 3</td>
<td>0.24</td>
<td>0.24</td>
</tr>
<tr>
<td>Mixer 4</td>
<td>0.24</td>
<td>0.24</td>
</tr>
<tr>
<td>Conveyor 1</td>
<td>0.057</td>
<td>0.057</td>
</tr>
<tr>
<td>Conveyor 2</td>
<td>0.057</td>
<td>0.057</td>
</tr>
<tr>
<td>Conveyor 3</td>
<td>0.057</td>
<td>0.057</td>
</tr>
<tr>
<td>Conveyor 4</td>
<td>0.057</td>
<td>0.057</td>
</tr>
</tbody>
</table>

ILS process:
(c) The annual resin throughput to the ILS process consisting of the following shall be limited to less than 1,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month:

<table>
<thead>
<tr>
<th></th>
<th>Mixer 5</th>
<th>Conveyor 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOC</td>
<td>0.35</td>
<td></td>
</tr>
<tr>
<td>HAP</td>
<td>2.35</td>
<td></td>
</tr>
</tbody>
</table>

(d) The VOC and HAP emissions from the following ILS wetout process shall not exceed the limits as specified below:

<table>
<thead>
<tr>
<th>ILS wetout process</th>
<th>VOC (lb/ton of resin throughput)</th>
<th>Single HAP (Styrene) (lb/ton of resin throughput)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 5</td>
<td>0.35</td>
<td>0.35</td>
</tr>
<tr>
<td>Conveyor 5</td>
<td>2.35</td>
<td>2.35</td>
</tr>
</tbody>
</table>

Scrap Resin Building (Scrap 1):
(e) The annual amount of scrap resin processed in the Scrap Resin Building (Scrap 1) shall be limited to less than 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
(f) The VOC and HAP emission from the Scrap Resin Building, identified as Scrap 1, shall not exceed the limits as specified below:

<table>
<thead>
<tr>
<th></th>
<th>VOC (lb/ton of resin throughput)</th>
<th>Single HAP (Styrene) (lb/ton of resin throughput)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scrap 1</td>
<td>21.23</td>
<td>21.23</td>
</tr>
</tbody>
</table>

(g) The annual resin throughput to the liquid resin storage tanks, identified as Tanks 1 through 8, shall be limited to less than 10,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit VOC to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Volatile Organic Compounds (VOC) Emission Limitation [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6, not applicable to the wetout conveyor, identified as Conveyor 5, the Permittee shall comply with the following:

(a) The annual resin throughput into the wetout conveyor, identified as Conveyor 5, using the ILS process, shall not exceed 1,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The VOC emission rates from the wetout conveyor, identified as Conveyor 5, using the ILS process, shall not exceed 2.35 pounds per ton of resin throughput.

Compliance with these limits shall limit the VOC emissions from Conveyor 5 to less than 5 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 8-1-6 not applicable.

D.1.3 Preventive Maintenance Plan

A Preventive Maintenance Plan is required for these facilities and any control device. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regards to the preventive maintenance plan required by this condition.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.4 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1(a), D.1.1(c), D.1.1(e), D.1.1(g) and D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the resin usage limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate the compliance status shall be available within 30 days of the end of each compliance period.

(1) The annual resin throughput to the following:
(a) CIPP wetout process,
(b) ILS wetout process, and
(c) storage tanks.

Records shall include purchase orders, invoices, and safety data sheet (SDS) necessary to verify the type and amount used each month and each compliance period.

(2) The amount of scrap resin processed in the Scrap Resin Building (Scrap 1) each month and each compliance period.

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.5 Reporting Requirements

A quarterly report and a summary of the information to document the compliance status with Conditions D.1.1(a), D.1.1(c), D.1.1(e), D.1.1(g) and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this section. The report submitted by the Permittee does not require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION  

Source Name: Insituform Technologies, Inc.  
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241  
FESOP Permit No.: 097-43151-00585  

This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.  

Please check what document is being certified:  

□ Annual Compliance Certification Letter  
□ Test Result (specify) __________________________________________________________  
□ Report (specify) _____________________________________________________________  
□ Notification (specify) _________________________________________________________  
□ Affidavit (specify) _____________________________________________________________  
□ Other (specify) ________________________________________________________________  

I certify that, based on information and belief formed after reasonable inquiry, the statements and  
information in the document are true, accurate, and complete.  

Signature:  
Printed Name:  
Title/Position:  
Date:  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: 097-43151-00585

This form consists of 2 pages

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business
    hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days
    (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency? Y N</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOx, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
<tr>
<td>If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:</td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________________________
Title / Position: ____________________________________________________
Date: ____________________________________________________________
Phone: ____________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FESOP Quarterly Report

Source Name:  Insituform Technologies, Inc.  
Source Address:  2130 Stout Field West Drive, Indianapolis, Indiana 46241  
FESOP Permit No.:  097-43151-00585  
Facility:

<table>
<thead>
<tr>
<th>Mixer 1</th>
<th>Mixer 2</th>
<th>Mixer 3</th>
<th>Mixer 4</th>
<th>Conveyor 1</th>
<th>Conveyor 2</th>
<th>Conveyor 3</th>
<th>Conveyor 4</th>
</tr>
</thead>
</table>

Parameter:  Resin throughput using the CIPP process  
Limit:  Less than 8,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____________________  YEAR: _____________________

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1 (Resin) (tons)</th>
<th>Column 2 (Resin) (tons)</th>
<th>Column 1 + Column 2 (Resin) (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td>0</td>
<td></td>
<td>0</td>
</tr>
<tr>
<td>Previous 11 Months</td>
<td>0</td>
<td></td>
<td>0</td>
</tr>
<tr>
<td>12 Month Total</td>
<td>0</td>
<td></td>
<td>0</td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.  
☐ Deviation/s occurred in this quarter.  
Deviation has been reported on: ___________________

Submitted by: _____________________________________________________
Title / Position: ____________________________________________________
Signature: ________________________________________________________
Date: ____________________________________________________________
Phone: ___________________________________________________________
FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: 097-43151-00585
Facility:

<table>
<thead>
<tr>
<th>Facility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 5</td>
</tr>
<tr>
<td>Conveyor 5</td>
</tr>
</tbody>
</table>

Parameter: Resin throughput using the ILS process
Limit: Less than 1,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1 (Resin) (tons)</th>
<th>Column 2 (Resin) (tons)</th>
<th>Column 1 + Column 2 (Resin) (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous 11 Months</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12 Month Total</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
  Deviation has been reported on: ___________________

Submitted by: ________________________________________________________
Title / Position: ______________________________________________________
Signature: ___________________________________________________________
Date: _______________________________________________________________
Phone: _______________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.  
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241  
FESOP Permit No.: 097-43151-00585  
Facility: Scrap Resin Building, identified as Scrap 1  
Parameter: Scrap Resin throughput  
Limit: Less than 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER: __________________</th>
<th>YEAR: __________________</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(Scrap Resin)</td>
<td>(Scrap Resin)</td>
<td>(Scrap Resin)</td>
</tr>
<tr>
<td></td>
<td>(tons)</td>
<td>(tons)</td>
<td>(tons)</td>
</tr>
<tr>
<td>This Month</td>
<td></td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- ☐ No deviation occurred in this quarter.  
- ☐ Deviation/s occurred in this quarter.  
  Deviation has been reported on: ___________________

Submitted by: _______________________________________________________

Title / Position: ____________________________________________________

Signature: _________________________________________________________

Date: _____________________________

Phone: _____________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: 097-43151-00585
Facility: Thanks 1 through 8

Parameter: Liquid Resin throughput
Limit: Less than 10,000 tons per twelve (12) consecutive month period with
compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER: _________________</th>
<th>YEAR: _________________</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1 (Liquid Resin) (tons)</th>
<th>Column 2 (Liquid Resin) (tons)</th>
<th>Column 1 + Column 2 (Liquid Resin) (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
   Deviation has been reported on: ___________________

Submitted by: _____________________________________________________
Title / Position: __________________________________________________
Signature: ________________________________________________________
Date: ____________________________________________________________
Phone: ___________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Insituform Technologies, Inc.
Source Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241
FESOP Permit No.: 097-43151-00585

Months: ___________ to ____________ Year: ______________

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

- □ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
- □ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Number of Deviations:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Probable Cause of Deviation:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Response Steps Taken:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
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</thead>
</table>

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<th>Number of Deviations:</th>
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<table>
<thead>
<tr>
<th>Probable Cause of Deviation:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Response Steps Taken:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
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<tr>
<td>---</td>
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<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
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<tbody>
<tr>
<td>Date of Deviation:</td>
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</tr>
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<td></td>
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<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
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<tbody>
<tr>
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<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: _______________________________________________________

Title / Position: ___________________________________________________________

Date: ___________________________________________________________________

Phone: _________________________________________________________________
On August 12, 2020, Insituform Technologies, Inc. submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Insituform Technologies, Inc. relating to the operation of a flexible pipeline liner manufacturing facility. Insituform Technologies, Inc. was issued its first FESOP Renewal (F 097-29683-00585) on March 24, 2011.

The source was issued FESOP Renewal No. F 097-29683-00585 on March 24, 2011. The source has since received the following approval:

FESOP Administrative Amendment No. 097-31296-00585, issued on December 30, 2011.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The source consists of the following permitted emission units:

(a) Four (4) static mixers, using cured in place pipe (CIPP) wetout process, using no control, as follow:

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Year Constructed</th>
<th>Maximum Capacity Throughput of liquid Resin (tons/hour)</th>
<th>Exhausting Bays</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 1</td>
<td>2006</td>
<td>9</td>
<td>0, 1, 2, 6, 2R, and 6R</td>
</tr>
<tr>
<td>Mixer 2</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mixer 3</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mixer 4</td>
<td>2012</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>36</strong></td>
<td><strong>--</strong></td>
</tr>
</tbody>
</table>

(b) One (1) static mixer, identified as Mixer 5, constructed in 2008, using integral lining system (ILS) wetout process, with a maximum throughput capacity of 9 tons per hour of liquid resin, using no control, and exhausting to bays 0, 1, 2, 6, 2R, and 6R.

(c) Four (4) wetout conveyors, using cured in place pipe (CIPP) wetout process, using no control, as follow:
### Emission Unit Information

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Year Constructed</th>
<th>Maximum Capacity Throughput of liquid Resin (tons/hour)</th>
<th>Exhausting Bays</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conveyor 1</td>
<td>2006</td>
<td>9</td>
<td>0, 1, 2, 6, 2R, and 6R</td>
</tr>
<tr>
<td>Conveyor 2</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Conveyor 3</td>
<td>2006</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Conveyor 4</td>
<td>2012</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total</td>
<td>36</td>
</tr>
</tbody>
</table>

(d) One (1) wetout conveyor, identified as Conveyor 5, constructed in 2008, using integral lining system (ILS) wetout process, with a maximum throughput capacity of 9 tons per hour of liquid resin, using no control, and exhausting to bays 0, 1, 2, 6, 2R, and 6R.

(e) One (1) scrap resin building, identified as Scrap 1, constructed in 2006, with a maximum capacity of 50 tons per year, using no control, and exhausting to stack 9.

(f) Eight (8) liquid resin storage tanks, identified as Tanks 1 through 8, constructed in 2006, each with a maximum storage capacity of 5,880 gallons and maximum throughput capacity of 1,800 gallons per hour, containing no more than 45 percent styrene by weight, using no control, and exhausting to stacks 1 through 8, respectively. These tanks are insulated and temperature cooled.

(g) One (1) fugitive area, identified as Fugitive 1, constructed in 2006, consisting of 36 valves, 8 pumps, and 100 flanges.

### Enforcement Issue

In accordance with 326 IAC 2-8-3(h), a timely renewal application is one that is submitted at least nine (9) months prior to the expiration date of the source's existing operating permit. This source's existing permit expired on March 24, 2021. The source's permit renewal application was not received by IDEM until August 12, 2020. IDEM is reviewing this matter and will take appropriate action.

### Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

### County Attainment Status

The source is located in Marion County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Attainment effective May 21, 2020, for the 2010 SO₂ standard for Center, Perry, and Wayne townships. Better than national standards for the remainder of the county.</td>
</tr>
<tr>
<td>CO</td>
<td>Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>
(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Marion County has been classified as attainment for PM2.5. Therefore, direct PM2.5, SO2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) SO2
U.S. EPA, in the Federal Register Notice 85 FR 30844 dated May 21, 2020, designated Marion County, Wayne Township as attainment for SO2 effective May 21, 2020. On August 6, 2020, the Environmental Rules Board issued an emergency rule adopting the U.S. EPA’s designation. Therefore, SO2 emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Other Criteria Pollutants
Marion County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<table>
<thead>
<tr>
<th>Fugitive Emissions</th>
</tr>
</thead>
</table>
Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

<table>
<thead>
<tr>
<th>Greenhouse Gas (GHG) Emissions</th>
</tr>
</thead>
</table>
On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4q18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.
Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM(^1)</td>
</tr>
<tr>
<td>-----------------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

\(^1\)Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."  
\(^2\)PM\(_{2.5}\) listed is direct PM\(_{2.5}\).  
\(^3\)Single highest source-wide HAP  
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V major source thresholds. Therefore, the source will be issued a FESOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other regulated air pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source will be issued FESOP Renewal because the source will limit HAP emissions to less than the Title V major source threshold levels. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) subject to the provisions of 326 IAC 2-7.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this FESOP renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

<table>
<thead>
<tr>
<th>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM(^1)</td>
</tr>
<tr>
<td>-----------------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
</tbody>
</table>
Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take limit(s) in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-8 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for the eight (8) liquid resin storage tanks, identified as Tanks 1 through 8, because each liquid resin storage tank has a storage capacity less than 19,800 gallons.

(b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW and 326 IAC 20-83 are not included in the permit for eight (8) liquid resin storage tanks, identified as Tank 1 through 8, since these liquid resin storage tanks are not organic liquids distribution (OLD) operations located at, or part of, a major source of HAP.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63, Subpart EEEE and 326 IAC 20-56 are not included in the permit for this source, since this source is not a major source of HAP.

(e) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.
Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants)
FESOP applicability is discussed under the Potential to Emit After Issuance section of this document.

FESOP VOC and HAP Limit(s)
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) not applicable, the Permittee shall comply with the following:

CIPP wetout process:
(a) The annual resin throughput to the CIPP wetout process consisting of the following shall be limited to less than 8,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month:

<table>
<thead>
<tr>
<th>Mixer 1</th>
<th>Mixer 2</th>
<th>Mixer 3</th>
<th>Mixer 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conveyor 1</td>
<td>Conveyor 2</td>
<td>Conveyor 3</td>
<td>Conveyor 4</td>
</tr>
</tbody>
</table>

(b) The VOC and HAP emissions from the following CIPP wetout process shall not exceed the limits as specified below:
ILS process:
(c) The annual resin throughput to the ILS process consisting of the following shall be limited to less than 1,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month:

<table>
<thead>
<tr>
<th>ILS wetout process</th>
<th>VOC (lb/ton of resin throughput)</th>
<th>Single HAP (Styrene) (lb/ton of resin throughput)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 5</td>
<td>0.35</td>
<td>0.35</td>
</tr>
<tr>
<td>Conveyor 5</td>
<td>2.35</td>
<td>2.35</td>
</tr>
</tbody>
</table>

Scrap Resin Building (Scrap 1):
(e) The annual amount of scrap resin processed in the Scrap Resin Building, identified as Scrap 1, shall be limited to less than 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(f) The VOC and HAP emission from the Scrap Resin Building, identified as Scrap 1, shall not exceed the limits as specified below:

<table>
<thead>
<tr>
<th>Scrap 1</th>
<th>VOC (lb/ton of resin throughput)</th>
<th>Single HAP (Styrene) (lb/ton of resin throughput)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>21.23</td>
<td>21.23</td>
</tr>
</tbody>
</table>

Resin storage tanks:
(g) The annual resin throughput to the liquid resin storage tanks, identified as Tanks 1 through 8, shall be limited to less than 10,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

These are existing limits, and no change has been made in this renewal.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.
326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2):

(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source (located in Marion County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide unlimited PTE of PM is less of than 10 tons per year; therefore, the source-wide actual emissions of PM are less than 10 tons per year. This source is not subject to the requirements of 326 IAC 6.5 because the source-wide PTE of PM is less than 100 tons per year and source-wide actual emissions of PM are less than 10 tons per year.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Marion County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Marion County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

Static Mixers identified as Mixer 1 through Mixer 5

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the static mixers, identified as Mixer 1 through Mixer 5, were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because each mixer has unlimited VOC potential emissions less than twenty-five (25) tons per year.

Wetout Conveyors identified as Conveyor 1 through Conveyor 4.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the wetout conveyors, identified as Conveyor 1 through Conveyor 4, were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because each conveyor has unlimited VOC potential emissions less than twenty-five (25) tons per year.

Wetout Conveyor 5
Insituform Technologies, Inc.  Page 9 of 10
Indianapolis, Indiana
Permit Reviewer: Hachem Ismaili Alaoui

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The wetout conveyor, identified as Conveyor 5, was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the Conveyor 5 is not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the Conveyor 5 to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the Conveyor 5 is not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

(1) The annual resin throughput into the wetout conveyor, identified as Conveyor 5, using the ILS process, shall not exceed 1,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) The VOC emission rates from the wetout conveyor, identified as Conveyor 5, using the ILS process, shall each not exceed 2.35 pounds per ton of resin throughput.

\[ \text{VOC} = \left( 1,500 \text{ tons/year} \right) \times \left( 2.35 \text{ lb/ton} \right) \times \left( 1 \text{ ton/2000 lb} \right) = 1.76 \text{ tons/year} \]

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the storage tanks, identified as Tanks 1 through 8, were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because each tank has unlimited VOC potential emissions less than twenty-five (25) tons per year.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the Scrap 1 was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the Fugitive 1 was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.
There are no compliance requirements applicable to this source in this renewal.

One-time stack test requirements were specified in the permit No. 097-22873-00585, issued on July 24, 2006, for at least one of the static mixers, identified as Mixer 1, 2, or 3, one of the wetout conveyors, identified as Conveyor 1, 2, or 3, and the scrap resin building, identified as Scrap 1. These stack tests were performed on January 17, 2007.

One time stack test requirements were specified in the permit No. 097-26144-00585, issued on April 22, 2008, for the static mixer, identified as Mixer 4, and the wetout conveyor, identified as Conveyor 4. These stack tests were performed on July 23, 2008.

**Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 12, 2020.

The construction of this proposed revision shall be subject to the conditions of the attached proposed New Source Review and FESOP Renewal No. 097-43151-00585.

The operation of this flexible pipeline liner manufacturing facility shall be subject to the conditions of the attached proposed FESOP Renewal No. 097-43151-00585.

The staff recommends to the Commissioner that the FESOP Renewal be approved.

**IDEM Contact**

(a) If you have any questions regarding this permit, please contact Hachem Ismaili Alaoui, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 232-2827 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/)

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).
## Emission Calculations

### PTE Summary

**Company Name:** Insituform Technologies, Inc.  
**Source Address:** 2130 Stout Field West Drive, Indianapolis, IN 46241  
**Permit Number:** F097-43151-00585  
**Reviewer:** Hachem Ismaili Alaoui

### Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs**</th>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixers 1 - 4 (CIPP Process)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>37.84</td>
<td>--</td>
<td>37.84</td>
<td>37.84</td>
</tr>
<tr>
<td>Mixer 5 (ILS Process)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>13.80</td>
<td>--</td>
<td>13.80</td>
<td>13.80</td>
</tr>
<tr>
<td>Conveyors 5 (ILS Process)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>92.64</td>
<td>--</td>
<td>92.64</td>
<td>92.64</td>
</tr>
<tr>
<td>Storage Tanks 1 - 8</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.51</td>
<td>--</td>
<td>0.51</td>
<td>0.51</td>
</tr>
<tr>
<td>Scrap 1</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.53</td>
<td>--</td>
<td>0.53</td>
<td>0.53</td>
</tr>
<tr>
<td>Fugitives 1</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>2.08</td>
<td>--</td>
<td>2.08</td>
<td>2.08</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td>--</td>
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<td>--</td>
<td>--</td>
<td>--</td>
<td>156.38</td>
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<td>156.38</td>
<td>156.38</td>
</tr>
</tbody>
</table>

* PM2.5 listed is direct PM2.5  
**Fugitive HAP emissions are always included in the source-wide emissions

### Limited Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs**</th>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixers 1 - 4 (CIPP Process)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.02</td>
<td>--</td>
<td>1.02</td>
<td>1.02</td>
</tr>
<tr>
<td>Mixer 5 (ILS Process)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.26</td>
<td>--</td>
<td>0.26</td>
<td>0.26</td>
</tr>
<tr>
<td>Conveyors 1 - 4 (CIPP Process)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.24</td>
<td>--</td>
<td>0.24</td>
<td>0.24</td>
</tr>
<tr>
<td>Conveyors 5 (ILS Process)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.76</td>
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<td>1.76</td>
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</tr>
<tr>
<td>Storage Tanks 1 - 8</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.51</td>
<td>--</td>
<td>0.51</td>
<td>0.51</td>
</tr>
<tr>
<td>Scrap 1</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.53</td>
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<td>0.53</td>
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<tr>
<td>Fugitives 1</td>
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<td>2.08</td>
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<tr>
<td><strong>Total:</strong></td>
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<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>6.40</td>
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<td>6.40</td>
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</tr>
</tbody>
</table>

* PM2.5 listed is direct PM2.5  
**Fugitive HAP emissions are always included in the source-wide emissions
### Appendix A: Emission Calculations

**VOC and HAP**

*From Mixers (Mixer 1 through Mixer 4)*

**Company Name:** Insituform Technologies, Inc.

**Source Address:** 2130 Stout Field West Drive, Indianapolis, IN 46241

**Permit Number:** F097-43151-00585

**Reviewer:** Hachem Ismaili Alaoui

#### CIPP Process

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Resin Throughput (tons/hr)</th>
<th>Emission Factor (lbs/ton)</th>
<th>VOC/HAP emissions (lbs/hr)</th>
<th>VOC/HAP emissions (tons/yr)</th>
<th>Worse HAP (Styrene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 1</td>
<td>9</td>
<td>0.24</td>
<td>2.16</td>
<td>9.46</td>
<td>9.46</td>
</tr>
<tr>
<td>Mixer 2</td>
<td>9</td>
<td>0.24</td>
<td>2.16</td>
<td>9.46</td>
<td>9.46</td>
</tr>
<tr>
<td>Mixer 3</td>
<td>9</td>
<td>0.24</td>
<td>2.16</td>
<td>9.46</td>
<td>9.46</td>
</tr>
<tr>
<td>Mixer 4</td>
<td>9</td>
<td>0.24</td>
<td>2.16</td>
<td>9.46</td>
<td>9.46</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td></td>
<td></td>
<td><strong>37.84</strong></td>
<td><strong>37.84</strong></td>
<td></td>
</tr>
</tbody>
</table>

FESOP Throughput Limit = 8,500 tons/year

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Limited Resin Throughput (tons/yr)</th>
<th>Emission Factor (lbs/ton)</th>
<th>Limited VOC/HAP emissions (lbs/yr)</th>
<th>Limited VOC/HAP emissions (tons/yr)</th>
<th>Worse HAP (Styrene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixers 1 - 4</td>
<td>8,500</td>
<td>0.24</td>
<td>2040</td>
<td>1.02</td>
<td>1.02</td>
</tr>
</tbody>
</table>

#### ILS Process

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Resin Throughput (tons/hr)</th>
<th>Emission Factor (lbs/ton)</th>
<th>VOC/HAP emissions (lbs/hr)</th>
<th>VOC/HAP emissions (tons/yr)</th>
<th>Worse HAP (Styrene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 5</td>
<td>9</td>
<td>0.35</td>
<td>3.15</td>
<td>13.80</td>
<td>13.80</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Limited Resin Throughput (tons/yr)</th>
<th>Emission Factor (lbs/ton)</th>
<th>Limited VOC/HAP emissions (lbs/yr)</th>
<th>Limited VOC/HAP emissions (tons/yr)</th>
<th>Worse HAP (Styrene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 5</td>
<td>1,500</td>
<td>0.35</td>
<td>525</td>
<td>0.26</td>
<td>0.26</td>
</tr>
</tbody>
</table>

#### Methodology

Styrene is the only VOC/HAP emitted.

*Emission Factor for the CIPP process was taken from an approved stack test conducted at the source on November 2006.

**Emission Factor for the ILS process was taken from an approved stack test conducted at the source on August 2008.

PTE ton/yr = Maximum Resin Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 (hrs/year) / 2000 (lbs/ton).

Limited PTE ton/yr = Limited Resin Throughput (tons/yr) x Emission Factor (lbs/ton) / 2000 (lbs/ton).

Only one process can operate at a time.
**Appendix A: Emission Calculations**
**VOC and HAP**
**From Conveyors (Conveyor 1 through Conveyor 4)**

**Company Name:** Insituform Technologies, Inc.
**Source Address:** 2130 Stout Field West Drive, Indianapolis, IN 46241
**Permit Number:** F097-43151-00585
**Reviewer:** Hachem Ismaili Alaoui

### CIPP Process

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Resin Throughput (tons/hr)</th>
<th>*Emission Factor (lbs/ton)</th>
<th>VOC/HAP emissions (lbs/hr)</th>
<th>VOC/HAP emissions (tons/yr)</th>
<th>Worse HAP (Styrene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetout Conveyor 1</td>
<td>9</td>
<td>0.057</td>
<td>0.513</td>
<td>2.25</td>
<td>2.25</td>
</tr>
<tr>
<td>Wetout Conveyor 2</td>
<td>9</td>
<td>0.057</td>
<td>0.513</td>
<td>2.25</td>
<td>2.25</td>
</tr>
<tr>
<td>Wetout Conveyor 3</td>
<td>9</td>
<td>0.057</td>
<td>0.513</td>
<td>2.25</td>
<td>2.25</td>
</tr>
<tr>
<td>Wetout Conveyor 4</td>
<td>9</td>
<td>0.057</td>
<td>0.513</td>
<td>2.25</td>
<td>2.25</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>Total</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>8.99</strong></td>
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</tr>
</tbody>
</table>

FESOP Throughput Limit = 8,500 tons/year

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Limited Resin Throughput (tons/yr)</th>
<th>*Emission Factor (lbs/ton)</th>
<th>Limited VOC/HAP emissions (lbs/yr)</th>
<th>Limited VOC/HAP emissions (tons/yr)</th>
<th>Worse HAP (Styrene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetout Conveyor 1 - 4</td>
<td>8,500</td>
<td>0.057</td>
<td>484.5</td>
<td>0.24</td>
<td>0.24</td>
</tr>
</tbody>
</table>

**Methodology**

Styrene is the only VOC/HAP emitted.

*Emission Factor for the CIPP process was taken from an approved stack test conducted at the source on November 2006.*

**Emission Factor for the ILS process was taken from an approved stack test conducted at the source on August 2008.**

PTE ton/yr = Maximum Resin Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 (hrs/year) / 2000 (lbs/ton).

Limited PTE ton/yr = Limited Resin Throughput (tons/yr) x Emission Factor (lbs/ton) / 2000 (lbs/ton).

Only one process can operate at a time.
### Appendix A: Emission Calculations

**VOC and HAP**

**Storage Tanks (Tank 1 through Tank 8)**

**Company Name:** Insituform Technologies, Inc.

**Source Address:** 2130 Stout Field West Drive, Indianapolis, IN 46241

**Permit Number:** F097-43151-00585

**Reviewer:** Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Component</th>
<th>Working Loss (lbs/year)</th>
<th>Breathing Loss (lbs/year)</th>
<th>Total Loss (lbs/year)</th>
<th>Total VOC emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tank 1</td>
<td>Residual Oil No. 6</td>
<td>0.05</td>
<td>0.00</td>
<td>0.05</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Styrene</td>
<td>126.39</td>
<td>0.00</td>
<td>126.39</td>
<td>0.06</td>
</tr>
<tr>
<td>Tank 2</td>
<td>Residual Oil No. 6</td>
<td>0.05</td>
<td>0.00</td>
<td>0.05</td>
<td>0.00</td>
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<tr>
<td></td>
<td>Styrene</td>
<td>126.39</td>
<td>0.00</td>
<td>126.39</td>
<td>0.06</td>
</tr>
<tr>
<td>Tank 3</td>
<td>Residual Oil No. 6</td>
<td>0.05</td>
<td>0.00</td>
<td>0.05</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Styrene</td>
<td>126.39</td>
<td>0.00</td>
<td>126.39</td>
<td>0.06</td>
</tr>
<tr>
<td>Tank 4</td>
<td>Residual Oil No. 6</td>
<td>0.05</td>
<td>0.00</td>
<td>0.05</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Styrene</td>
<td>126.39</td>
<td>0.00</td>
<td>126.39</td>
<td>0.06</td>
</tr>
<tr>
<td>Tank 5</td>
<td>Residual Oil No. 6</td>
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<tr>
<td></td>
<td>Styrene</td>
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<td>126.39</td>
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</tr>
<tr>
<td>Tank 6</td>
<td>Residual Oil No. 6</td>
<td>0.05</td>
<td>0.00</td>
<td>0.05</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Styrene</td>
<td>126.39</td>
<td>0.00</td>
<td>126.39</td>
<td>0.06</td>
</tr>
<tr>
<td>Tank 7</td>
<td>Residual Oil No. 6</td>
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<tr>
<td></td>
<td>Styrene</td>
<td>126.39</td>
<td>0.00</td>
<td>126.39</td>
<td>0.06</td>
</tr>
<tr>
<td>Tank 8</td>
<td>Residual Oil No. 6</td>
<td>0.05</td>
<td>0.00</td>
<td>0.05</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Styrene</td>
<td>126.39</td>
<td>0.00</td>
<td>126.39</td>
<td>0.06</td>
</tr>
</tbody>
</table>

**Worse HAP (Styrene)**: 0.51 tons/yr

**Total HAP**: 0.51 tons/yr

**Methodology**

* The total emissions from TANKS 4.09d output were 126.39 lbs VOC/year (0.06 tons/year) from tank loading of 10,000 tons of liquid resin in one year. Since the calculations incorporate the maximum annual throughput for the entire facility and the eight tanks are identical, the emission calculations are independent of the particular tank that is filled and the 0.06 tons of VOC/year represent the total emission for all tank loading operations, or from all tanks.

1 Residual Oil No. 6 was used as surrogate because it is representative of the actual component in the resin.

2 The storage tanks are insulated and temperature cooled to prevent "breathing loss."
### Scrap 1

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (tons/yr)</th>
<th>*Percentage (%) of scrap</th>
<th>Maximum amount of scrap</th>
<th>**Emission Factor (lbs VOC/ton)</th>
<th>VOC/HAP emissions (lbs/yr)</th>
<th>VOC/HAP emissions (tons/yr)</th>
<th>Worse HAP (Styrene) ton/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scrap 1</td>
<td>10,000</td>
<td>0.5%</td>
<td>50.00</td>
<td>21.23</td>
<td>1061.50</td>
<td>0.53</td>
<td>0.53</td>
</tr>
</tbody>
</table>

*Only 0.5% of the maximum throughput is scrap.

**Emission factor was taken from an approved IDEM stack test conducted at the source on November 2006.

### Fugitive 1

<table>
<thead>
<tr>
<th>Component</th>
<th>*Number of Components</th>
<th>Stream Type</th>
<th>**Emission Factor per component (Kg/hr)</th>
<th>Emission Factor per component (lbs/hr)</th>
<th>***Max% Weight fraction VOC/Styrene in the resin</th>
<th>VOC Emissions Rates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Valves</td>
<td>36</td>
<td>Light Liquid</td>
<td>0.00403</td>
<td>0.0089</td>
<td>44.2%</td>
<td>0.14</td>
</tr>
<tr>
<td>Pumps</td>
<td>8</td>
<td>Light Liquid</td>
<td>0.0199</td>
<td>0.0438</td>
<td>44.2%</td>
<td>0.15</td>
</tr>
<tr>
<td>Flanges</td>
<td>100</td>
<td>Light Liquid</td>
<td>0.00183</td>
<td>0.0040</td>
<td>44.2%</td>
<td>0.18</td>
</tr>
</tbody>
</table>

**Emission factors were taken from EPA’s Protocol for Equipment Leak Emission Estimates (Document 453/R-95-017, November 1995)

"Table 2 - 1: SOCMI Average Emission Factor".

***Resin contains Styrene which is considered as VOC/HAP. A stack test performed at the source on November 2006 shows that the Max% VOC (Styrene) is 44.2%.

Emission factor lb/hr = (emission factor kg/hr) x 2.2 lb/kg

PTE (tons/year) = (emission factor lb/hr) x (number of components) x (Max% weight fraction of VOC/Styrene) x 1 ton/2000 lb x 8760 hr/yr

### Methodology

*Number of Components refers to the number of Valves, Pumps, or Flanges.

"Emission factors were taken from EPA’s Protocol for Equipment Leak Emission Estimates (Document 453/R-95-017, November 1995)

"Table 2 - 1: SOCMI Average Emission Factor".

***Resin contains Styrene which is considered as VOC/HAP. A stack test performed at the source on November 2006 shows that the Max% VOC (Styrene) is 44.2%.

Emission factor lb/hr = (emission factor kg/hr) x 2.2 lb/kg

PTE (tons/year) = (emission factor lb/hr) x (number of components) x (Max% weight fraction of VOC/Styrene) x 1 ton/2000 lb x 8760 hr/yr
February 4, 2021

Kyle Rowland
Insituform Technologies Inc
17988 Edison Avenue
Chesterfield MO 63005

Re: Public Notice
Insituform Technologies, Inc.
Permit Level: FESOP Renewal
Permit Number: 097-43151-00585

Dear Kyle Rowland:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM’s online searchable database: [http://www.in.gov/apps/idem/caats/](http://www.in.gov/apps/idem/caats/) . Choose Search Option by Permit Number, then enter permit 43151

and

IDEM’s Virtual File Cabinet (VFC): [http://www.IN.gov/idem](http://www.IN.gov/idem) . Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: [https://www.in.gov/idem/5474.htm](https://www.in.gov/idem/5474.htm)

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Indianapolis Public Library - West Branch, 1216 South Kappes St, Indianapolis IN 46221. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.
Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Hachem Ismaili Alaoui, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-2827 or dial (317) 232-2827.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
February 4, 2021

To: Indianapolis Public Library - West Branch 1216 South Kappes St Indianapolis IN 46221

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Insituform Technologies, Inc.
Permit Number: 097-43151-00585

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

February 4, 2021
Insituform Technologies, Inc.
097-43151-00585

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter 2/28/2020
Mail Code 61-53

<table>
<thead>
<tr>
<th>Name and address of Sender</th>
<th>Type of Mail:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
<td>CERTIFICATE OF MAILING ONLY</td>
</tr>
</tbody>
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<td>Kyle Rowland Instuform Technologies Inc 17988 Edison Avenue Chesterfield MO 63005 (Source CAATS)</td>
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<td>Robert Berry Plant Manager INSITUFORM TECHNOLOGIES 2130 Stout Field West Dr Indianapolis IN 46241 (RO CAATS)</td>
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<td>Indianapolis Public Library - West Branch 1216 South Kappes St Indianapolis IN 46221 (Library)</td>
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<td></td>
<td>Indianapolis City Council and Mayors office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)</td>
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<td></td>
<td>Carmel City Council and Mayors Office 1 Civic Square Carmel IN 46032 (Local Official)</td>
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<td>Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)</td>
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<td>Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)</td>
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<td>Planning Div., Dept. of Metropolitan Development 1735 S. West St. Indianapolis IN 46225 (Local Official)</td>
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<td>City of Indianapolis, Attn: General Council 200 East Washington Street, Rm E Indianapolis IN 46204 (Affected Party)</td>
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<td>Sebastian Valverde 4235 Springwood Trail Indianapolis IN 46228 (Affected Party)</td>
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<td>Marion County Health Department 3338 North Rural Street Indianapolis IN 46205 (Local Official)</td>
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Total number of pieces Listed by Sender: 15

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