



Indiana Department of Environmental Management

Protecting Hoosiers and Our Environment Since 1986



IDEM Regulatory Update

Wednesday, June 4th

P4P2 Quarterly Meeting

Manchester Tank and Equipment

Elkhart, Indiana



Small Business Regulatory Coordinator

- Jessica Faust-Hamblin
- Stays abreast of regulatory actions
- Attends the [Environmental Rules Board](#) meetings
- Provides [monthly summaries](#) of the Indiana Register



Upcoming Compliance Due Dates

- June 15:
 - Second quarter payment due for NPDES Annual Bill, if paying in quarterly installments.
- June 30:
 - Wastewater operator certification renewal applications due (certifications expire every two (2) years).
- July 1:
 - [Hazardous Materials Registration](#) due to the U.S. Department of Transportation.
 - [SARA 313 Toxic Release Inventory \(TRI\) Report](#) due.
 - [Annual Emission Statement](#) (EMITS: Emissions Inventory Tracking System) due annually or every [3 years \[PDF\]](#) based on the potential to emit, pollutant, and county.



Upcoming Compliance Due Dates

- July 1:
 - [Air Annual Compliance Certification](#) due for all companies except those required to submit on April 15.
- July 15:
 - [Solid Waste Quarterly Reports](#) due.
- July 20:
 - [HW-020](#) Hazardous Waste Disposal Tax Return Form and Fee due for disposal of hazardous waste on-site through underground injection during the previous quarter.
- July 30:
 - Semi-Annual Air Compliance Monitoring Report due for January through June.



Upcoming Compliance Due Dates

- July 30:
 - Air Quarterly Deviation and Compliance Monitoring Report due for April through June.
 - Quarterly Air Permit reports (e.g., usage reports) due for April through June.
- September 15:
 - Third quarter payment due for NPDES Annual Bill, if paying in quarterly installments.
- September 28:
 - Annual Green House Gas Reports are due to the U.S. EPA if your facility is part of the 41 source categories in 40 CFR 98 (otherwise the report is due March 31).



Upcoming Compliance Due Dates

- October 15:
 - [Solid Waste Quarterly Reports](#) due.
- October 20:
 - [HW-020](#) Hazardous Waste Disposal Tax Return Form and Fee due for disposal of hazardous waste onsite through underground injection during the previous quarter.
- October 30:
 - Air Quarterly Deviation and Compliance Monitoring Report due for July through September.
 - Quarterly Air Permit reports (e.g., usage reports) due for July through September.



Upcoming Compliance Due Dates

- October 31:
 - [CAIR Energy Efficiency/Renewable Energy \(EE/RE\)](#) Results due for the Ozone Season ending September 30 of the current year.
- [Compliance Due Dates](#) webpage provides a full list.



Indiana Department of Environmental Management

Protecting Hoosiers and Our Environment Since 1986



Upcoming Requirements



Office of Air Quality

Organic Solvent Degreasing Operations

- [Organic Solvent Degreasing Operations](#)
 - Physical process of utilizing organic solvents to remove grease, fats, oils, wax, or soil from various metals, glass, or plastic items
 - Effective March 2013, [326 IAC 8-3](#) amended concerning emissions of Volatile Organic Compounds (VOC) from degreasing operations, including:
 - [Cold cleaner degreasing operations](#)
 - [Open top vapor degreasing operations](#)
 - [Conveyorized degreasing operations](#)



Office of Air Quality

Organic Solvent Degreasing Operations

- [Cold Cleaner Degreasing Operations](#)
 - Effective January 1, 2015:
 - No person shall **operate** a cold cleaning degreasing operation:
 - With a VOC composite partial vapor pressure **exceeding** one (1) millimeter of mercury measured at 20 degrees Celsius (68 degrees Fahrenheit)
 - Record keeping requirements, operators:
 - Name and address of solvent supplier
 - Date of purchase
 - Type of solvent purchased
 - Total volume of solvent purchased
 - True vapor pressure of solvent measured in millimeters of mercury at 20 degrees Celsius (68 degrees Fahrenheit)



Office of Air Quality

Organic Solvent Degreasing Operations

- [Cold Cleaner Degreasing Operations](#)
 - Effective January 1, 2015, requirements for supplier:
 - No person shall cause or allow the **sale of solvents** for use in cold cleaning degreasing operations:
 - With a VOC composite partial vapor pressure **exceeding** one (1) millimeter of mercury measured at 20 degrees Celsius (68 degrees Fahrenheit)
 - In an amount of > five (5) gallons
 - During any seven(7) consecutive days
 - Record keeping requirements same as operator



Office of Air Quality

Organic Solvent Degreasing Operations

- CTAP Contact:
 - Mark Stoddard
 - mstoddar@idem.in.gov
 - (317) 233-1039



Office of Air Quality

Organic Solvent Degreasing Operations

- Questions?



Indiana Department of Environmental Management

Protecting Hoosiers and Our Environment Since 1986



Topics of Interest



Office of Land Quality

Corrective Action

- History:
 - Prior to 1984:
 - Required clean-up of releases of hazardous waste and hazardous constituents to ground water from “[regulated units](#)” at Hazardous Waste (HW) [Treatment](#), [Storage](#), and [Disposal](#) Facilities (TSDF)
 - Did not require clean-up of releases from other types of units
 - 1984 and after:
 - Hazardous and Solid Waste Amendments (HSWA)
 - Required [Corrective Action \(CA\)](#) at [permitted](#) and [interim-status](#) HW TSDF
 - All releases of hazardous waste and/or hazardous constituents from [Solid Waste Management Units \(SWMU\)](#) at HW TSDFs regardless of when the release occurred



Office of Land Quality

Corrective Action

- Purpose:
 - Require cleanup of contamination resulting from release of [hazardous constituents](#) from nonhazardous waste management units or [SWMUs](#) regardless of when release occurred at HW [TSD Facilities](#) or [interim-status](#) facilities
 - Ensure that RCRA permitted facilities do not become Superfund sites
- Regulatory Authority:
 - IDEM, Office of Land Quality, [Hazardous Waste Permits Section](#)
 - U.S. EPA Region 5



Office of Land Quality

Corrective Action

- Indiana Facilities subject to CA
 - Region 5 list
- Applicability to CA Requirements
 - Permitted Treatment, Storage, or Disposal Facility (TSDF) with CA requirements addressed in permit
 - Interim-status
 - Facilities submitted Part A of permit application, received interim status, but chose not to submit Part B of the application
 - CA addressed through final order (agreed order or consent decree)
 - Operating as a HW TSDF without approval from regulatory authority
 - CA addressed through enforcement action and final order (agreed order or consent decree)



Office of Land Quality

Corrective Action

- Priority of Facilities subject to CA
 - **High**, *Medium*, and Low
 - **High** priority – permit conditions or final orders issued
 - *Medium* priority – 50% issued permit conditions or final orders
- If a facility is subject to CA, not contacted by regulatory authority:
 - Proactive option
 - Contact OLQ, Hazardous Waste Permit Section
 - Victor Windle at (317) 232-3242 or vwindle@idem.in.gov



Office of Land Quality

Corrective Action

- CA Process
 - *RCRA Facility Assessment* (RFA) aka initial site assessment
 - Identification of **SWMUs** and determine whether there have been **routine and systematic** releases
 - *RCRA Facility Investigation* (RFI) aka site characterization
 - *Interim Corrective Measures*
 - Obvious, immediate measures to correct an on-going release
 - *Corrective Measures Study* (CMS) aka Evaluation and Selection of Remedial Alternatives
 - *Corrective Measures Implementation*
 - Implementation of remedies to complete CA



Office of Land Quality

Corrective Action

- Solid Waste Management Unit (SWMU)
 - Facilities subject to CA required to investigate and cleanup releases of hazardous waste or hazardous constituents released from SWMU
 - Any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid and hazardous waste. Such units include any area at a facility at which hazardous constituents have been **routinely and systematically released** into the environment.



Office of Land Quality

Corrective Action

- [Solid Waste Management Unit \(SWMU\)](#), includes:
 - Units used for waste management such as landfills, surface impoundments, land treatment units, waste piles, tanks, sumps, container storage areas, incinerators, and injection wells
 - Old, inactive waste disposal areas such as old disposal trenches, pits, and open burn areas
 - Maintenance areas
 - Units generally exempt from hazardous waste management requirements of RCRA



Office of Land Quality

Corrective Action

- **Best Management Practices (BMPs) and proper maintenance** of solid waste management activities to avoid designation
 - Burden of proof falls on the business
 - Documentation
- **Take-away:**
 - Determine whether or not facility is subject to CA
 - Avoid creating SWMUs by applying BMPs to minimize **routine and systematic releases** from solid waste management activities



Office of Land Quality

Corrective Action

- CTAP Contact:
 - Becky Joniskan
 - rjoniska@idem.in.gov
 - (317) 233-5553
- OLQ Contact:
 - Mike Sickels
 - msickels@idem.in.gov
 - (317) 232-3406



Office of Land Quality

Corrective Action

- Questions?



Status Update

- [Boiler Compliance Requirements](#) webpage now live
 - Questions?
 - Krista McKenna at kmckenna@idem.in.gov or (317) 234-3913
 - David McIver at dmciver@idem.in.gov or (317) 232-8456



Future Topics of Interest

- **Let Us Know Your Suggestions!**
 - Evaluation Form
 - Adam Casey, P4P2 Coordinator at acasey@idem.in.gov
 - Maria Renner, P2 & Recycling Section Chief at mrenner@idem.in.gov



Further Questions

Jessica Faust-Hamblin

Compliance and Technical Assistance Program

Office of Pollution Prevention and Technical Assistance

jfaust@idem.IN.gov

(317) 234-1191