



AIR & WASTE MANAGEMENT
ASSOCIATION

SINCE 1907

Indiana NEWS

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News from the Indiana Chapter of
the Air & Waste Management
Association

Inside this Issue

2 Stack Testing
Workshop a Success!

3-7 Special Feature
HAPs Emission
Reporting Debate

8 Introducing the Indy
2004 Leadership

9 Mold Remediation
and Guidelines for
Indoor Environments

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COUNTDOWN INDY 2004: WE'RE UP AND RUNNING

After months of preplanning, the Indy Local Host Committee (LHC) held its inaugural meeting on September 12th. During October, Headquarters Meeting Manager Louise Wallach met with the LHC, along with our Indianapolis Convention & Visitors Association representative, Tracy Povolock. Discussed during the meeting were Committee responsibilities, schedule, budgets, sponsorships and future LHC meeting dates. We are excited to report that the LHC is up and running!

The next LHC meeting is scheduled for January. We plan to preview some concepts for the Indy 2004 lapel pin and discuss our pollution prevention/sustainable development conference theme ideas.

"We are currently meeting individually with those Committee Chairs who need to begin implementing their programs, such as the Technical Program and Student Committees," said Conference Chair Dave Hoffman. "Other Committees have plenty of time since we got an early start in the planning process."

Louise Wallach was also pleased with our LHC progress and complemented the Committee on its efforts to date. "We are fortunate to have a Local Host Committee of this caliber," said Wallach, who has planned the past seven Annual Meeting and Exhibitions for the Association.

Continued on Page 9

IDEM LEADERS LOOK AHEAD TO 2003

Indianapolis- On December 5, more than fifty environmental professionals gathered to hear **Janet McCabe, Mary Ellen Gray and Bruce Palin** describe IDEM's year 2003 program priorities. A summary of their comments follows:

Janet McCabe, Assistant Commissioner, Office of Air Quality

100% on-time permitting. There have been no late permits since June 1998. In 2001, 116 construction permits, 9 PSD permits and 1,500 other actions were completed within regulatory deadlines.

Title V Permits—"The end is in sight." IDEM has received about 750 permit applications and has about 150 of the more complex permits left to complete. All but 40 should be complete by June and the balance by the end of the year.

Continued on page 11

Special Feature: HAPs Emission Reporting Debate

**IDEM, Industry
Coalition, and
Improving Kids'
Environment give their
viewpoints.**

Beginning on Page 3

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<u>Education Chair</u>	Cheryl Carlson Indianapolis ERMD (317) 327-2281 ccarlson@indygov.org

Stack Testing Workshop a Success!

Over 100 people attended the Stack Testing Workshop in August, making it the most well attended event in the Chapter's history. A warm thanks to the speakers from EPA's Clean Air Markets Division (CAMD), IDEM's Office of Air Quality, testing and consulting representatives, the legal community, industry and academia who made this workshop a success! The morning session covered the basic elements of stack testing, including a discussion of testing conditions in permits, a look at stack testing prerequisites, and a dialogue on potential non-compliance issues. After lunch and a visit with exhibitors, the workshop was divided into two concurrent tracks. The first track focused on policy updates/changes and implementation of monitoring requirements, while the second track narrowed in on the technical issues of stack testing and monitoring.

We received a lot of positive feedback from the attendees of this workshop, and the Chapter hopes to provide similar workshops of this caliber in the future that blend information from the national level and the specifics of activities in Indiana. Ideas always appreciated and considered: Williams_Michele_M@lilly.com

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SPECIAL FEATURE

HAPs EMISSION REPORTING DEBATE

Introduction

Senate Enrolled Act (SEA) 259 was passed this spring by the 2002 Indiana General Assembly. The new law authorized new hazardous air pollutant (HAP) reporting rules if necessary and directed the Environmental Quality Service Council (EQSC) to propose a plan for HAP monitoring and to consider methods for the Indiana Department of Environmental Management (IDEM) and the Indiana State Department of Health (ISDH) to obtain and communicate HAP release information.

The new law also tasked IDEM and ISDH with developing a 5-year HAP strategy and providing it to the EQSC by November 1, 2002. SEA 259 directed that the strategy include:

- A) An inventory of known HAP emissions in Indiana, including quantities and types of sources.
- B) An assessment of the quality and usefulness of existing data on HAP emissions, air quality monitoring, and human health impacts;
- C) A description of the gaps in the existing data, alternatives to fill those gaps, and IDEM's preferred approach among those alternatives;
- D) Based on available information, IDEM's top 10 priorities to address significant risks posed by HAP releases and the basis for each priority;
- E) Based on available information, an inventory of commercial and industrial air pollutant sources, air pollutant source categories, and HAPs that require additional study to determine potential human health impacts;
- F) A plan that identifies additional HAP data needs, including the intended uses of, processes to be used to collect, and resources necessary to collect and assess the additional data.

Complying with SEA 259 was a massive effort by all involved: the EQSC, the 2 state agencies, and concerned industry and environmental groups. Much work is left to be done, and to educate our membership, we asked for the viewpoints of some of the involved parties:

- IDEM,
- the Indiana Manufacturers Association and Chamber of Commerce, and
- Improving Kids' Environment.

Following are their comments on what was done and what is left to be done to fulfill SEA 259 and move ahead on this issue.

IDEM VIEW

By Kathy Watson, Office of Air Quality

Indiana has made great strides in cleaning up the air. Air pollution levels for all measured pollutants have improved dramatically over the past 20 years. Remarkable progress has been made concurrent with the growth of Indiana's manufacturing base. Since the passage of the Clean Air Act Amendments in 1990, the focus nationally has moved beyond the six criteria pollutants toward finding out more about the 188 hazardous air pollutants (HAP) and reducing exposure to them.

Indiana has reduced emissions of HAP by implementing Clean Air Act programs and through its own state initiatives like the styrene rule. Still, Indiana ranks high among the states in industrial HAP emissions. Recent EPA studies and our own air quality monitoring confirm that Hoosiers may be exposed to unhealthy levels of certain HAP from industry, cars and trucks and other commercial activities.

To identify unhealthy exposures and take appropriate action, IDEM began one effort to increase authority to collect information on industrial HAP to supplement available information. A proposed rule to increase reporting requirements has stirred considerable debate about the necessity for expending more dollars to report information and questions on the state's priorities for addressing HAP and public health.

Under Senate Enrolled Act 259, enacted in 2002, IDEM and ISDH evaluated currently available data sources on HAP, with special attention to the quality and usefulness of existing data sources, and where the data gaps exist. Currently available data allow the agencies and other interested parties to draw some conclusions about HAP risks, but they also highlight areas where uncertainties exist.

The SEA 259 report, available at www.in.gov/idem/air/SEA259/, provides a comprehensive look what is known about hazardous air pollution in Indiana and makes

recommendations on priorities for the coming years.

The report shows that there are some areas in the state where risk of adverse health impacts from HAP may be higher than 1) elsewhere in the state, 2) elsewhere in the country or 3) levels generally felt to be acceptable. For example,

- The statewide cumulative average cancer risk resulting from exposure to HAP is estimated to be 60 cases in a million, or 9 percent higher than the national average. US EPA considers cancer risk less than or equal to one in a million to be negligible.
- The most populous regions of the state have a population-adjusted estimated cancer risk of 94 cases in a million, almost 60% greater than the statewide average.
- Point and area sources are the major contributors to cancer risk estimates in 99 of the top 100 census tracts with the highest risk estimates. The top 100 census tracts – with an estimated aggregated population of over 350,000 persons – all have an estimated risk greater than 113 cases in a million.

The departments intend to focus their efforts on particular areas of concern highlighted by the SEA 259 report, including gathering additional information where appropriate to address those concerns. We welcome the participation of all interested persons.

Kathy Watson is Branch Chief for the Office of Air Quality at the Indiana Department of Environmental Management. She can be reached at (317) 233-5694 or at Kwatson@dem.state.in.us.

INDUSTRY VIEW

*By: Thomas W. Rarick, KERAMIDA
Environmental Inc.*

The Indiana State Chamber of Commerce and the Indiana Manufacturers Association, along with a number of Indiana businesses and business associations, have been closely tracking the Indiana Department of Environmental Management (IDEM) and the Indiana Department of Health's (IDOH) development of their 5-year Hazardous Air Pollutant Strategy. The strategy has been under development over the past summer and the draft report was presented to the Environmental Quality Service Council in late October of this year. The draft report provides a detailed summary of information from various air toxics monitoring, air toxics inventory and air toxics modeling information sources. The strategy also makes a number of findings and recommendations, many of which are consistent with recommendations made by the Industry Coalition.

The Industry Coalition supported the first of the strategy's priorities, which is to focus on the continued implementation of current federal programs including the implementation of the Maximum Achievable Control Technology (MACT) standards. Industry must focus considerable resources in the implementation of these new regulations to reduce HAP emissions. New programs that may detract from both the public and private sector's efforts to implement these federal regulations, may lessen the positive impact from these programs.

The Industry Coalition also supported the use of continued or expanded monitoring of HAPs to identify potential HAP issues and to provide a sound basis for assessing potential risks associated with HAP emissions. The use of actual monitoring data is needed to validate the existence of a potential problem identified through the review of emissions and/or modeling studies. Given the potential for inaccurate emissions information and the inherent inaccuracies associated with modeling,

confirmatory monitoring data is an essential element to risk characterization. In order to accomplish this, the state will need to have a toolbox of monitoring techniques available to them to use in a flexible and responsive manner.

The draft report was not entirely clear on the recommended approach to filling potential data gaps in emissions inventories. This has been a key issue with the Industry Coalition, as there were a number of concerns with earlier efforts to significantly expand the reporting of HAPs emissions. The Industry Coalition supports the option presented in the strategy, which calls for the establishment of a general authority for the department to collect specific HAP data by request to further assess potential health risks. This is an appropriate step beyond relying only on the existing emissions inventories and voluntary requests for further data. The Industry Coalition felt strongly that expanded authorities through rulemaking to increase routine reporting requirements for specific chemicals, source sectors or geographic areas is not warranted given the overall assessments provided in the report.

Another priority was for continued efforts to reduce HAP emissions through pollution prevention to reduce HAP emissions. Since a substantial portion of HAP emission reductions achieved to date have come from voluntary efforts by individual industrial sources to reduce or eliminate HAPs in industrial processes, this is also an area where the Industry Coalition supports the proposed strategy. The strategy also included a priority, which identifies New Source Review as an area of focus. This area of focus was supported to the extent that it involves the implementation of new source MACT standards under promulgated the federal MACT regulations including the existing requirements for new source review under the section 112(g) regulations. The results of the various evaluations in the strategy did not support the expansion of new source review efforts beyond the requirements of these programs.

The last priority identified in the draft strategy was to continue the ongoing process of

working with stakeholders and the establishment of a process for ongoing review of priorities. Industry believes this is a particularly important element of the overall strategy. The Industry Coalition commented that a permanent advisory group should be formed to provide periodic review of the development and implementation of the HAP strategy. The advisory group should include members that offer a variety of perspectives including perspectives of industry.

The 5-year strategy is a good start at understanding the true nature and extent of the impact of air toxics in Indiana. It should also help to guide the wise use of both public and private sector resources to protect the health of Indiana's citizens.

Thomas Rarick is Senior Vice President of KERAMIDA Environmental Inc. He can be reached at (317) 685-6600 or keramida@keramida.com.

ENVIRONMENTAL VIEW

By: Tom Neltner, Improving Kids' Environment

Improving Kids' Environment helped craft legislation that limits Indiana's hazardous air pollutant emission reporting rules. At the same time, IKE has been an ardent advocate for public notification of combined sewer overflows and parent notification of pesticide use in schools and child-care facilities. This apparent contradiction has some people scratching their head. Why would IKE want to limit the public's right-to-know about emissions of hazardous air pollutants?

IKE firmly believes that public right-to-know is a critical element of a regulatory program. The public needs to understand what is being released into the air they breathe. The regulatory agency responsible for protecting that air has an obligation to get that information so it can identify and address potential problems and so it can educate the public about those problems.

For too long, Indiana has relied on voluntary emission reporting of HAPs.

Voluntary reporting is helpful but generally ineffective. The best organizations will report both good and bad news. Most will report only good news or report only when it is convenient. The information not reported is usually what the agency and the public most need to know. The information gaps make it impossible to get a handle on the data.

The HAP emissions reporting rule proposed by Indiana Department of Environmental Management (IDEM) would require the submission of so much detailed information that the public would have little ability to use it. It was not clear that IDEM had the resources to analyze the information and translate it into something the public could use. Instead of creating a new reporting system, IKE favors:

1. Building on the success of the Toxics Release Inventory (TRI) by expanding it to fill the gaps that IDEM has identified. Specifically, rule needs to:
 - a. Require TRI reports for those large facilities that are currently exempt from reporting;
 - b. Lower the TRI reporting threshold in urban areas for those chemicals of most significant concern; and
 - c. Give IDEM the authority to investigate and enforce compliance with these expanded TRI requirements.
2. Giving IDEM the authority, resources and expertise to
 - a. Obtain more detailed information – including emissions monitoring – from facilities when it has evidence that HAP emissions may pose a serious threat that is not likely to be resolved in a timely manner by pending regulations or existing standards; and

- b. Assess situations where HAP emissions are suspected of threatening public health through targeted emissions reporting, air monitoring, and other means.

IKE believes this strategy gives the public and IDEM the information it needs without overloading the system or generating lots of information that is unlikely to be used. Information that is collected but not effectively used will only frustrate the regulated community and the public.

IDEM has made tremendous strides at addressing air toxics. Pursuant to Senate Enrolled Act 259, IDEM and the Indiana State Department of Health have published an excellent draft Five-Year Hazardous Air Pollutant Strategy. This strategy set priorities for action and is entirely consistent with IKE's recommendations.

3. IDEM has crafted regulations to address specific problems at steel mills and fiber reinforced plastic fabricators that have gone beyond the minimum standards set by the Environmental Protection Agency. It has monitored air toxics in urban areas across the state. And it has effectively shared that information with the public. Having completed its responsibilities under SEA-259, IDEM now needs a rule that is carefully tailored to fill the gaps in its existing efforts.

Tom Neltner is President of the Indiana non-profit organization Improving Kids' Environment. He can be reached at (317) 442-3973 or neltner@in.net.

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homepage at
<http://www.awma.org/events/>*

Introducing the Indy 2004 Leadership

Joining the Indy 2004 Local Host Committee (LHC) for its first official meeting on October 9th was Louis Wallach (center) from the Association's Headquarters in Pittsburgh. Wallach, who joined the Association in 1996, has planned the last seven Annual Conferences & Exhibitions (ACE). Coming from the hospitality industry, where she gained 15 years of experience before joining A&WMA, she is a Certified Meeting Professional and is responsible for contracts and planning of all of the Association's meetings and workshops. "I'm really looking forward to working with the Indy Local Host Committee," says Wallach. "Their level of enthusiasm is fantastic."

General Conference Vice-Chair Anne Heighway, QEP, (left) led the effort to bring the ACE to Indy while serving as Indiana Chapter Chair. She has also been a member of the Sections and Chapters Council, Director for the East Central Section and is now a Special Director of the Indiana Chapter. A Senior Environmental Affairs Associate at Eli Lilly and Company, Heighway has a solid and varied technical background, which includes work experience with IDEM, environmental consulting and the electric utility industry. She is not only active in the Association, but also is Past Chair and Program Chair for the Central Indiana Technical and Environmental Societies (CITES), in addition to serving as Treasurer and Finance Committee Chair for Earth Day Indiana.

Dave Hoffman, Ph.D., (right) is long time participant at the national level, having served two terms on the Association's Board of Directors, the most recent being when he was A&WMA President from 1992-3. He is a Fellow and Honorary Member and has held many positions, served on numerous committees and was the Technical Program Vice-Chair for the Minneapolis ACE. "Having worked on an ACE before and having taken early retirement, I was in a good position to assist Anne Heighway in trying to win approval for Indy 2004. And with her enthusiasm and impressive record of inspiring the Indiana Chapter, I agreed to be the General Conference Chair of Indy 2004 only if Anne would participate as "Co-chair". She was the logical choice," Hoffman said. "We believe that all of the right elements are coming together to make the Indy 2004 a model for future ACEs to follow. That's our vision."



Mold Remediation and Guidelines for Indoor Environments

By Rodney Muller, Heritage Industrial Services, LLC

Mold has been in the news very much these days. Although the media frenzy is recently exposing mold issues, mold has been around since biblical times. The U.S. EPA, OSHA, ASHRAE and other agencies and associations including media and lawsuits have provided education and a new awareness of the effects of mold.

Not all molds are bad. Some molds are found in cheeses, are used in making wines, and decays the leaves in our yards. Mold is a subgroup of the fungi kingdom. Mold growth needs very little to begin. All mold needs is nutrients, moisture, and temperature. Some of the main nutrients in which mold grows are the very products that are used in buildings (i.e. drywall paper, insulation, wood, glue, carpet, carpet padding, ceiling tiles, etc...). Some ways moisture can enter a building is by a leaking pipe, an improperly designed or maintained HVAC system, broken sump pumps, leaking roof, and natural hazards. Not all molds are visible and can be found on the backside of drywall, behind wallpaper, under carpet, and behind baseboards. The best way to prevent mold from forming is to remove moisture within 24 to 48 hours. Mold cannot be 100% removed; mold can only be reduced to a normal spore count.

Some common molds are Aspergillus, Penicillium, Cladosporium, and Stachybotrys. Mold spores are very tiny and travel through the air very easily. When large amounts of mold spores develop and are present they can cause allergic reactions, eye and skin irritations, flu like symptoms, respiratory problems, and in rare cases actual mold infections. Each person may react to mold differently. Mold can have greater effects on humans with damaged or weakened immune systems.

There are no current government regulations on mold. There are only non-regulatory guidelines that have been developed by the New York City Department of Health, the U.S. Environmental Protection Agency, and others. The guidelines suggest that contamination over 100 square feet should be properly removed by a remediation contractor using full containment, a health and safety professional contractor, negative pressurization, clearance air monitoring, and full personnel protection equipment.

Always remember to correct the existing moisture condition prior to remediating a building to help prevent mold from reoccurring. For a Quick reference table of Recommended Guidelines for Indoor Environments from Indoor Air Quality Association (IAQA) go to: <http://www.iaqa.org/guidelines.htm>.

Rodney Muller, is the Mold Remediation Division Manager at Heritage Industrial Services, LLC and can be reached at (317) 541-9290 or by email at rodney.muller@heritageindustrial.com.

Countdown Indy 2004: We're Up and Running Continued from Page 1

Fundraising efforts and currently underway and a marketing plan will be developed in the coming weeks. "Dave and I have been meeting monthly for quite a while and we are pleased that our many hours of planning are coming together. We couldn't ask for a more dedicated and enthusiastic Committee," says Conference Vice-Chair Anne Heighway whose leadership as Indiana Chapter Chair in early 1999 led to our opportunity to host the 2004 Annual Conference & Exhibition.

"We want to keep everyone informed of our progress and will provide an update in every issue of *Indiana NEWS* until the conference," states Heighway. "We'll also profile our Committee Chairs and share their insights in coming issues. So keep watching this space for continual updates and future opportunities for Chapter member involvement in Indy 2004."

Occasionally, we find it helpful to review the nuts and bolts of environmental regulations. This article is an attempt to bring up those useful bits of information in an easy-to-read format.

Air Operating Permitting Thresholds in INDIANA Uncontrolled Potential to Emit in Tons per Year for Entire Source				
Pollutants	Exemption	Registration	Minor source permit	Major source Title V permit
VOCs no control req.	<10	≥10 ... <25	≥25 ... <100	≥100 (≥25)*
VOCs control req.	<5	≥5 ... <25	≥25 ... <100	≥100 (25)*
NOX	<10	≥10 ... <25	≥25 ... <100	≥100 (25)*
CO	<25	≥25 ... <100	<100	≥100
SO ₂	<10	≥10 ... <25	≥25 ... <100	≥100
PM	<5	≥5 ... <25	≥25 ...	NA
PM-10	<5	≥5 ... <25	≥25 ... <100	≥100
Lead	<0.2	≥0.2 ... <5	≥5 ... <100	≥100 (10)**
Fluorides	<5	≥5 ... <25	≥25 ... <100	≥100
TRC or H ₂ S	<5	≥5 ... <25	≥25 ... <100	≥100
Single HAP	<10	<10	<10	≥10
Combined HAPs	<25	<25	<25	≥25

Note: ()* for Lake and Porter Counties
()** for Lead Smelters

Based on the potential to emit a source maybe qualify for:

1. Exemption
2. Registration
3. Minor Source Operating Permit (MSOP)
4. Federally Enforceable State Operating Permit (FESOP)
5. Title V (major source) Operating Permit

BACK TO BASICS: prepared by:



8770 Guion Road, Suite B
Indianapolis, IN 46268
Phone: 317-876-8375
Fax: 317-876-8382

IDEM Leaders
Continued from page 1

MACT Hammer—IDEM was processing applicability determinations to be ready for the Part 2 application process, but this may change with the December 9, 2002 proposed Regulations.

NSR Reform Regulations—IDEM is working to understand the recently signed regulatory revisions, and is also waiting on SIP approval for its PSD program.

Compliance Strategy—The job of inspectors is changing from field observations to reviewing records from CEMS, stack tests and compliance certifications. IDEM will continue to focus on larger emitting sources to maximize protection of the environment. She pointed to the recent Non Rule Policy Document on Annual Compliance Certifications as an improvement to this process.

Ozone, PM 2.5 and Regional Haze—EPA expects to designate non-attainment areas for ozone by April 2004 and PM 2.5 by the end of 2004. IDEM is to make recommendations to EPA on ozone areas by April 2003. There is uncertainty over the impact of an area being designated as non-attainment for the eight-hour ozone standard. The current data shows that parts of all urban areas will likely be non-attainment for ozone. IDEM is working with WI, IL, MI and OH on these regional issues including haze.

Toxics—IDEM released its draft report on the current state of knowledge at the end of October and a final report to the EQSC will be released in December. IDEM wants to: Continue to implement the Federal air toxics program; address identified/suspected areas of concern including areas of the state, types of industries and specific pollutants. IDEM will continue discussions with stakeholders and will comply with the EQSC's request that any draft HAP reporting rule go to the EQSC before being sent to the Air Board.

Other Topics Discussed—Lead Abatement, implementation of the NOx SIP Call Rule and optimizing the ambient air-monitoring network.

Mary Ellen Gray, Deputy Assistant Commissioner, Office of Water presented their priorities:

TMDLs—New 303(d) list has many more impaired water bodies based upon IDEM's five year effort to look at information for every water body in the State. EPA and IDEM are working to prioritize efforts based upon the knowledge of the reason for any impairment and the possible use of other programs to address the issue.

Rulemaking—OWQ is revising rules 5, 6 and 13 to address EPA's phase II storm water rule. Rule 5 will apply to construction sites with 1 acre (instead of 5) of disturbed land. Rule 6 will exclude industries that take certain steps to prevent pollution and Rule 13 will require storm water management plans for 173

municipalities of about 10,000 people in an urbanized area.

Triennial Review—Issues include mercury, bacteria (ecoli), antidegradation and "fast track."

Wetlands Rulemaking—This issue is on hold pending action of the EQSC recommendation for legislation to address the isolated wetlands issue.

Permits—NPDES permit backlog is similar to Title V—the more complex issues remain. IDEM is addressing the basic issues to allow the permits to be issued.

Fees—OWQ wants increased NPDES permit fees and new fees for the drinking water and storm water programs.

Other Issues—Long Term Control Plans for Combined Sewer Overflows, watershed planning, permitting of alternative wastewater systems and special NPDES permits for individual homeowners in Allen County.

Bruce Palin, Deputy Assistant Commissioner, Office of Land Quality spoke on the following:

RISC Update—The RISC program, which became effective in February 2002, is working —staff has completed 143 closure reviews and 25 sites have completed closure. Every site has used some non-default option such as a restrictive covenant which allows a site that can meet industrial levels to obtain closure. Bruce recommends that anyone who will be using some non-default aspect have a pre-meeting with IDEM staff to avoid wasted effort. Current RISC work includes completing the Proceedings from last summer's symposium; vapor intrusion, monitored natural attenuation for petroleum and MTBE concentrations for pre-RISC sites.

Rulemaking—Issues include consolidating requirements from other programs into the solid waste rules so a single permit can be issued to a solid waste management facility. These include storm water and asbestos certification requirements. Other rulemaking includes UST changes and a general NPDES permit for Confined Animal Feedlot Operations.

Brownfields—IDEM expects a share of a new \$200 million annual Federal Grant program to be used for: Assessment Grants, Revolving Loan Funds and Site Cleanups (the government or a non-profit must own the site).

Electronic Tier II Reporting—The Indiana Emergency Response Commission will pay the electronic filing fee charged by Access Indiana for everyone who uses the electronic reporting system.

Permit Fees—The Office of Land Quality is also seeking fee increases.

Tom Easterly is the President of Environmental Business Strategies, Inc. which provides environmental technical and regulatory assistance to manufacturing companies. He can be reached at (219) 628-2829 or at easterly@myvine.com.



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c/o Jim Hauck
Barnes & Thornburg
11 S. Meridian Street
Indianapolis, IN 46204

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