INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

March 3, 2017

Dear Interested Party:

Re: Draft Hazardous Waste Management Permit Renewal
Tradebe Treatment and Recycling, LLC
East Chicago, Indiana
IND000646943

Enclosed is a copy of the public notice that appeared on March 3, 2017 in the Times Media. The Indiana Department of Environmental Management (IDEM) is announcing the availability for public review of a draft permit renewal, pursuant to Rule 329 IAC 3.1 and 40 CFR Part 264, for Tradebe Treatment and Recycling, LLC (Tradebe) to continue to operate a hazardous waste storage and treatment facility at 4343 Kennedy Avenue, East Chicago, Indiana. IDEM is inviting public comments on the draft permit.

The draft permit specifies the conditions under which the facility must manage hazardous waste in order to maintain compliance with the State and Federal statutes and rules.

Included for your information is a copy of the Fact Sheet. The draft permit is available for public inspection at the East Chicago Public Library, 2401 E. Columbus Dr., East Chicago, Indiana. The documents can also be accessed via IDEM's Virtual File Cabinet (VFC) at: www.IN.gov/idem/6953.htm. VFC permit document numbers are:

Permit Application 80330135, 08378160, 80393027, 80405948
Draft Permit Conditions 80427223
Permit Attachments:
A 80427224 B 80427225 C 80427226 D 80427227 F 80427228
G 80427229 H 80427230 I 80427231 J 80427232

IDEM is accepting written comments on the draft permit for Tradebe. Comments must be postmarked by April 17, 2017 and should be sent to Ms. Ruth Jean at rjean@idem.IN.gov or the following address:

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

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

Sincerely,

Jeffrey L. Sewell, Chief
Permits Branch
Office of Land Quality

RAJ/gjo

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE

DATE OF NOTICE: March 3, 2017
COMMENTS DUE: April 17, 2017

The Indiana Department of Environmental Management (IDEM) has received a hazardous waste permit renewal request from:

Tradebe Treatment and Recycling, LLC
4343 Kennedy Ave., East Chicago, Indiana
IND000646943

Tradebe operates a commercial hazardous waste storage and treatment facility. The facility receives a variety of wastes which include hazardous and non-hazardous wastes. This permit will allow Tradebe to continue with storage and treatment of hazardous wastes in containers and tanks.

IDEM has reviewed the permit application, and has drafted a proposed permit. The draft permit describes how the facility must manage hazardous waste in order to comply with State and Federal statutes and rules. A copy of the permit renewal application, draft permit, and Fact Sheet are available for your review at:

- East Chicago Public Library, 2401 E. Columbus Dr., East Chicago, IN
- IDEM Virtual File Cabinet at: www.IN.gov/idem/6953.htm

IDEM is providing the public an opportunity to submit written comments and/or request changes to the proposed permit conditions.

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

Written comments with supporting documentation, or a written request for a public hearing, should be sent to Ms. Ruth Jean at rjean@idem.IN.gov or the following address:

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

IDEM will respond to all relevant comments and specify which provisions of the draft permit were changed, if any. To receive the Notice of Decision, please make a written request to Ruth Jean at the address above.

If you have any questions about the permit or public notice process, please contact Ruth Jean (317) 232-3398 or rjean@idem.IN.gov.

FACT SHEET
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Hazardous Waste Management Permit Renewal
Tradebe Treatment and Recycling, LLC
East Chicago, Indiana

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100 N. Senate Avenue • Indianapolis, IN 46204
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Eric J. Holcomb
Governor

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March 3, 2017

The Indiana Department of Environmental Management (IDEM) has prepared this fact sheet to inform the public of the process involved in issuing a Hazardous Waste Management Permit Renewal to Tradebe Treatment and Recycling, LLC (Tradebe).

The Resource Conservation and Recovery Act (RCRA), passed in 1976, regulates the management of hazardous waste. In the State of Indiana, IDEM is authorized by the Indiana Environmental Statute, IC 13-22, to administer the hazardous waste permit program and related hazardous waste management requirements. Any facility that treats, stores, and/or disposes of hazardous waste in Indiana is required to obtain a hazardous waste management permit. In addition, any hazardous waste facility receiving a permit is required to provide corrective action for all releases of hazardous waste or of hazardous waste constituents from any solid waste management unit on-site.

Facility Description
Tradebe operates a commercial hazardous waste storage and treatment facility at 4343 Kennedy Avenue, East Chicago, Indiana. The facility receives a variety of wastes which include hazardous and non-hazardous wastes. The purpose of this permit renewal is to continue to allow the storage and treatment of hazardous wastes in containers and tanks. Methods of treatment include, but are not limited to, accumulation, repacking, blending, mixing, bulking, neutralization, and transferring of wastes to off-site facilities for subsequent recovery, reuse, treatment and/or disposal. Twenty-seven (27) container storage areas storing a total of 756,250 gallons of hazardous waste will be permitted for storage and/or treatment. Additionally, 17 tanks will be utilized for storage and/or treatment of 201,007 gallons of hazardous waste.

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

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

II. General Facility Conditions: These conditions are also general in nature and required for all facilities, but are more specific in determining operating requirements.

III. Container Storage Conditions: These conditions include waste identification, container management, secondary containment, and inspection requirements.

IV. Tank Storage Conditions: These conditions include waste identification, tank location and design, operating requirements, secondary containment, and inspection requirements.

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

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

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

Permit Attachments

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

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

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

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

Attachment E - Ground Water Monitoring: Ground water monitoring is not required for this facility.

Attachment F - Procedures to Prevent Hazards: This attachment contains the security measures, and preparedness and prevention procedures to ensure the safety of the workers on-site, as well as to prevent unauthorized access. This section is closely related to the Contingency Plan and Inspection Plan.

Attachment G - Contingency Plan: The Contingency Plan describes the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or non-sudden

release of hazardous waste or hazardous waste constituents to the air, soil, or water at the facility.

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

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

Attachment J - Corrective Action for Solid Waste Management Units (SWMUs): This attachment details the facility's obligation to notify IDEM of SWMUs, and information pertaining to releases from any SWMUs. It also describes current conditions at the facility, and how the facility will investigate each SWMU and AOC for releases of hazardous waste(s) and hazardous constituents(s).

Public Participation

The public comment period for this operating permit renewal began on the date of the public notice, March 3, 2017, and ends on April 17, 2017. The official public notice was published on March 3, 2017, in the Times Media, Munster, Indiana. Written comments with supporting documentation should be mailed to Ms. Ruth Jean at the following address:

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

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

Questions may be directed to Ms. Ruth Jean with IDEM's Permits Branch at (317) 232-3398 or *rjean@idem.IN.gov*.

For More Information

Copies of the draft permit renewal are available for public review at the East Chicago Public Library, 2401 E. Columbus St., East Chicago, Indiana, and on IDEM's Virtual File Cabinet at: www.IN.gov/idem/6953.htm.