

## **Tradebe's Clean Air Act Permit Modification - Background**

Tradebe is a hazardous waste processing facility at 4343 Kennedy Ave. in East Chicago. The quantity and highly toxic types of waste processed there makes Tradebe, on a risk-adjusted basis, **one of the largest toxic chemical processors in Lake County**.<sup>1</sup>

The Indiana Department of Environmental Management (IDEM) has proposed a so-called "minor modification" of Tradebe's Clean Air Act (CAA) Permit. The main purpose of this modification is to authorize Tradebe to operate a drum shredder, which Tradebe installed in 2004 and has **been operating for 20 years without a permit**. This raises **serious concerns about Tradebe's ability to comply with its permit and operate safely**. IDEM should not issue this permit without first addressing Tradebe's many long-standing violations.

### **Issues & Questions**

#### **IDEM Should Take Appropriate Enforcement Action On The Unpermitted Drum Shredder**

Tradebe has **been unlawfully operating this drum shredder for 20 years**, releasing air pollution into the surrounding environment. IDEM's proposed permit modification does not state how IDEM intends to **address the unlawful emissions** from this unit for the last two decades.

#### **Questions and Concerns:**

- What happened in IDEM's process that let Tradebe unlawfully operate a drum shredder for 20 years?
- If the permit modification is approved, what will IDEM do to ensure Tradebe operates the drum shredder lawfully (e.g., monitoring and reporting requirements, emissions control equipment)?
- What enforcement actions are being taken to address Tradebe's unlawful behavior? How will IDEM hold Tradebe accountable for the environmental and health impacts of 20 years of unlawful emissions?

#### **The Permit Modification Rewards Tradebe Despite Many Past Permit Violations**

Tradebe has **repeatedly violated the Clean Air Act**, including by (1) failing to maintain proper carbon adsorption systems, (2) failing to maintain its closed-vent system allowing leaks to occur, and (3) operating its flare with visible emissions for long periods of time. These violations suggest a **systemic failure by Tradebe to manage its existing operations safely**. The proposed permit modification allows Tradebe to continue operating this drum shredder without meaningful accountability for past violations.

#### **Questions and Concerns:**

- Why hasn't IDEM imposed higher financial penalties for Tradebe's violations, or required Tradebe to make real improvements before issuing the permit modification?
- Given Tradebe's history of violations, what changes has IDEM made in this permit modification to ensure Tradebe will comply with the law? How did IDEM determine that those changes are sufficient?

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<sup>1</sup> EPA TRI Toxics Tracker, RSEI Hazard score

## **Tradebe's Drum Shredder Raises Serious Emissions and Air Pollution Control Concerns**

This unit can **shred up to 185,000 drums annually and can emit high concentrations of volatile organic compounds (VOCs).**<sup>2</sup> VOCs are detrimental to public health: they react with oxygen in the air to produce ozone, which can cause chest pain and coughing and can worsen health conditions like bronchitis, emphysema, and asthma. The unit also emits particulate matter (PM), like tiny airborne metal shards from shredded drums.

The emissions from this drum shredder may not be adequately controlled by Tradebe's emissions control systems, which have repeatedly failed CAA requirements and may fall short of current best practices.

### **Questions and Concerns:**

- What information does IDEM have about the emissions control systems Tradebe is using? How long have these systems been in use? How does IDEM verify Tradebe's maintenance of these systems?
- Without rigorous monitoring, there is no assurance that Tradebe's emissions control systems are functioning effectively. How will IDEM ensure these systems operate at the claimed 98% efficiency?
- VOC emissions vary greatly depending on the contents of the waste drum. How will IDEM ensure the drums are emptied and properly cleaned? How will Tradebe monitor and report VOC emissions?
- Has IDEM asked Tradebe for PM emissions data from the drum shredder? How will IDEM ensure these calculations are accurate? What enforcement measures will be taken if they are inaccurate?

## **Tradebe's Permit Modification Should Require an Environmental Justice Analysis**

As a facility handling large amounts of toxic chemicals with a troubling track record of permit violations, Tradebe must operate transparently to reassure the community. The EPA's *Principles for Addressing Environmental Justice Concerns in Air Permitting* emphasize the need for an environmental justice analysis before approving permit modifications. IDEM should require a thorough cumulative impacts assessment before approving this permit modification, to protect this already overburdened community.

### **Questions and Concerns:**

- How can IDEM facilitate an ongoing dialogue between Tradebe and the community so that residents are informed of potential health hazards, particularly around VOC emissions and their effects on ozone?
- Will IDEM conduct an environmental justice analysis to Tradebe's contribution to the cumulative pollution burden of the surrounding community?

## **Take Action!**

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**Make your voice heard on October 30 by coming to the public meeting about Tradebe's permit!**

Also, share your concerns about Tradebe with IDEM by sending a written comment to **[msura@idem.IN.gov](mailto:msura@idem.IN.gov)** by **November 4**.

For more information about ongoing efforts to hold Tradebe accountable and improve its operations, email the East Chicago Calumet Coalition Community Advisory Group at: **[TradebeConcerns@gmail.com](mailto:TradebeConcerns@gmail.com)**

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<sup>2</sup> In an October 2022 inspection, the EPA found VOCs concentrated at 4400ppm at the inoperative drum shredder.