NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for MetalX Auburn LLC in Dekalb County
Significant Permit Revision No.: 033-43479-00110

The Indiana Department of Environmental Management (IDEM) has received an application from MetalX Auburn, located at 1101 Oren Drive, Auburn, IN 46706, for a significant revision of its FESOP issued on November 18, 2020. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow MetalX Auburn LLC to make certain changes at its existing source. MetalX Auburn LLC has applied to replace two (2) primary shredders, each with a maximum capacity of 20 tons per hour, with a single primary shredder with a maximum capacity of 40 tons per hour.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Eckhart Public Library
603 S. Jackson St.
Auburn, IN 46706

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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 SPR 033-43479-00110 in all correspondence.

Comments should be sent to:

James Sperl
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for James Sperl or (317) 232-0459
Or dial directly: (317) 232-0459
Fax: (317) 232-6749 attn: James Sperl
E-mail: jsperl@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, the IDEM Regional Office 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 James Sperl of my staff at the above address.

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality
Mr. Neal Rifkin  
MetalX Auburn LLC  
295 S. Commerce Dr.  
Waterloo, IN 46793

Re: 033-43479-00110  
Significant Revision to  
F033-40263-00110

Dear Mr. Rifkin:

MetalX Auburn LLC was issued a Federally Enforceable State Operating Permit (FESOP) No. F033-40263-00110, on November 8, 2018, for a stationary aluminum shredder and scrap metal processing plant located at 1101 Oren Drive, Auburn, IN 46706. On November 18, 2020, the Office of Air Quality (OAQ) received an application from the source requesting the replacement of two (2) primary shredders, each with a maximum capacity of 20 tons per hour, with a single primary shredder with a maximum capacity of 40 tons per hour. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission unit is approved for construction at the source:

(a) One (1) low speed, high torque Aluminum shredder system, identified as shredder, approved in 2021 for construction, with a maximum capacity of 40 tons per hour, using a baghouse as control, and exhausting outdoors and consisting of the following:

(1) One (1) shredder, identified as Primary Shredder;

The following construction conditions are applicable to the proposed project:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below-listed attachment(s). Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:

Attachment A: 40 CFR 63, Subpart CCCCC, Source Category: Gasoline Dispensing Facilities

Previously issued approvals for this source containing this attachment are available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/).

Previously issued approvals for this source are also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: [http://www.in.gov/idem/](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.


A copy of the permit is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/). A copy of the application and permit is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: [http://www.in.gov/idem/](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. 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).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, please contact James Sperl, 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) 232-0459 or (800) 451-6027, and ask for James Sperl or (317) 232-0459.

Sincerely,

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - DeKalb County
Dekalb County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

MetalX Auburn
1101 Oren Drive
Auburn, Indiana 46706

(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.

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<tr>
<td>Heath Hartley, Section Chief</td>
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<td>Permits Branch</td>
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<td>Office of Air Quality</td>
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Attachment A: 40 CFR 63, Subpart CCCCCC, National Emission Standards for Hazardous Air
Pollutants for Source Category: Gasoline Dispensing Facilities
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 aluminum shredder and scrap metal processing plant.

Source Address: 1101 Oren Drive, Auburn, Indiana 46706
General Source Phone Number: (260) 232-3000
SIC Code: 5093 (Scrap and Waste Materials)
County Location: De Kalb
Source Location Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit Program
Minor Source, under PSD and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

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) One (1) Wire Chopping Pre-Shredder System, constructed in 2014, with a maximum throughput capacity of 10 tons/hr, utilizing no control equipment, exhausting within the building, and consisting of:

(1) Six (6) Conveyors.

(b) One (1) Wire Chopping System, constructed in 2014, with a maximum throughput capacity of 4.5 tons/hr, utilizing a cyclone for particulate control, exhausting within the building, and consisting of:

(1) Twenty-eight (28) Conveyors;
(2) Two (2) Wire Choppers; and
(3) Three (3) Air Tables;

(c) One (1) low speed, high torque Aluminum shredder system, identified as shredder, approved in 2021 for construction, with a maximum capacity of 40 tons per hour, using a baghouse as control, and exhausting outdoors and consisting of the following:

(1) One (1) shredder, identified as Primary Shredder;
(2) Fifteen (15) conveyor belts;
(3) One (1) vibrating feeder;
(4) One (1) screener; and
(5) Three (3) eddy currents.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) The following VOC and HAP storage containers:
(1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons.
(2) Vessels storing the following:
(A) Hydraulic oils
(B) Lubricating oils

(b) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) consecutive months.

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs:
(1) Soldering Equipment
(2) Welding Equipment

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons, consisting of:

(1) One (1) 250-gallon storage tank with a maximum anticipated fuel dispensing rate of 50 gallons per month.

Under 40 CFR 63, Subpart CCCCCC, this is an affected facility.

(e) Storage Piles, approved in 2018 for modification, including the following:
(1) Outside:
   (i) One (1) storage pile of scrap aluminum, with a maximum anticipated pile size of 1 acre;
(2) Inside:
   (i) Five (5) storage piles of insulated copper wire, with a combined maximum anticipated pile size of 1/2 acre;
   (ii) Eight (8) storage piles of aluminum, stainless steel and copper, with a combined maximum anticipated pile size of 1/2 acre;

(f) One (1) Baler, identified as Harris Baler, constructed in 2012, used to bale copper and aluminum, with a maximum capacity of 16,000 pounds per hour, using no controls, and exhausting indoors.

(g) Two (2) X Ray Lines, identified as X Ray Line, approved for construction in 2018, with a combined maximum capacity of 7.5 tons per hour, using no controls, exhausting indoors, and consisting of the following:

(1) Eight (8) conveyors; and
(2) Two (2) Vibratory Batch feeders.

(h) Twenty (20) Natural gas combustion heaters, constructed prior to 2018, using no controls, exhausting to the atmosphere and consisting of the following:

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</table>
(i) Three (3) diesel fired heaters, each constructed prior to 2018, each with a maximum heat input capacity of 0.125 MMBtu/hr, each using no controls, and each exhausting to the atmosphere.

(j) Paved roadways and parking lots.

A.4 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) for 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, F033-40263-00110, is issued for a fixed term of five (5) 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 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) If required by specific condition(s) in Section D of this permit, 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.

(b) 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).

(c) 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 or Northern Regional Office 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
   Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

(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 F033-40263-00110 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

(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. 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 V
   Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
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 two hundred fifty (250) 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 forty percent (40%) 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:
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).
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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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) One (1) Wire Chopping Pre-Shredder System, constructed in 2014, with a maximum throughput capacity of 10 tons/hr, utilizing no control equipment, exhausting within the building, and consisting of:

   (1) Six (6) Conveyors.

(b) One (1) Wire Chopping System, constructed in 2014, with a maximum throughput capacity of 4.5 tons/hr, utilizing a cyclone for particulate control, exhausting within the building, and consisting of:

   (1) Twenty-eight (28) Conveyors;
   (2) Two (2) Wire Choppers; and
   (3) Three (3) Air Tables;

(c) One (1) low speed, high torque Aluminum shredder system, identified as shredder, approved in 2021 for construction, with a maximum capacity of 40 tons per hour, using a baghouse as control, and exhausting outdoors and consisting of the following:

   (1) One (1) shredder, identified as Primary Shredder;
   (2) Fifteen (15) conveyor belts;
   (3) One (1) vibrating feeder;
   (4) One (1) screener; and
   (5) Three (3) eddy currents.

(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 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The PM emissions from Primary Shredder shall not exceed 5.0 pounds per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit PM, to less than two-hundred fifty (250) tons per twelve (12) consecutive month period, each and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 FESOP and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The PM\textsubscript{10} emissions from Primary Shredder shall not exceed 5.0 pounds per hour.

(b) The PM\textsubscript{2.5} emissions from Primary Shredder shall not exceed 5.0 pounds per hour.

Compliance with these limits, combined with the potential to emit PM\textsubscript{10} and PM\textsubscript{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM\textsubscript{10} and PM\textsubscript{2.5} to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall
render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following emission units shall not exceed the emission rates in pounds per hour when operating at the process weight rates located in the table below:

<table>
<thead>
<tr>
<th>Emission Unit/Process</th>
<th>Emission Rate (lb/hr)</th>
<th>Process Weight Rate (tons/hour)</th>
<th>Equation Used</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Shredder</td>
<td>42.53</td>
<td>40</td>
<td>(b)</td>
</tr>
<tr>
<td>Wire Chopping Pre-Shredder System</td>
<td>19.18</td>
<td>10</td>
<td>(a)</td>
</tr>
<tr>
<td>Wire Chop System</td>
<td>11.23</td>
<td>4.5</td>
<td>(a)</td>
</tr>
</tbody>
</table>

The pounds per hour limitation was calculated with the following equations:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

(a) \[ E = 4.10 P^{0.67} \]

Where \( E \) = rate of emission in pounds per hour; and \( P \) = process weight rate in tons per hour

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

(b) \[ E = 55.0 P^{0.11} - 40 \]

Where \( E \) = rate of emission in pounds per hour; and \( P \) = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

In order to assure compliance with Conditions D.1.1, D.1.2 and D.1.3, the baghouse for particulate control shall be in operation and control emissions from the Primary Shredder facility at all times the Primary Shredder facility is in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

Not later than 180 days after the startup of Primary Shredder, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouse stack exhaust utilizing methods approved by the commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.
Compliance Monitoring Requirements  [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.7 Visible Emissions Notations

(a) Visible emission notations of baghouse stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the baghouse(s) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) consecutive months.

(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.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

(a) Ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
(3) If used, solvent spray:
   (A) must be a solid, fluid stream; and
   (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for this facility and its associated control device. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

   (1) The name and address of the solvent supplier.
   (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
   (3) The type of solvent purchased.
   (4) The total volume of the solvent purchased.
   (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION E.1 NESHAP

Emissions Unit Description:

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons, consisting of:

1. One (1) 250-gallon storage tank with a maximum anticipated fuel dispensing rate of 50 gallons per month.

Under 40 CFR 63, Subpart CCCCCC, this is an affected facility.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-8-4(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart CCCCCC.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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 Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment A to the operating permit), for the emission unit(s) listed above:

1. 40 CFR 63.11110;
2. 40 CFR 63.11111(a), (b), (e), (f), (h), (i), and (j);
3. 40 CFR 63.11112(a), (c), and (d);
4. 40 CFR 63.11113(b) and (c);
5. 40 CFR 63.11115;
6. 40 CFR 63.11116;
7. 40 CFR 63.11125(d);
8. 40 CFR 63.11126(b);
9. 40 CFR 63.11130;
10. 40 CFR 63.11131;
11. 40 CFR 63.11132;
12. Table 3 to Subpart CCCCCC of Part 63.
Emission Limitations and Standards [326 IAC 2-8-4(1)]

E.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

CERTIFICATION

Source Name: MetalX Auburn
Source Address: 1101 Oren Drive, Auburn, Indiana 46706
FESOP Permit No.: F033-40263-00110

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: MetalX Auburn
Source Address: 1101 Oren Drive, Auburn, Indiana 46706
FESOP Permit No.: F033-40263-00110

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>Field</th>
<th>Answer</th>
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<tbody>
<tr>
<td>Date/Time Emergency started:</td>
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<tr>
<td>Date/Time Emergency was corrected:</td>
<td></td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
<td>Y N</td>
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<tr>
<td>Describe:</td>
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<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO\textsubscript{2}, VOC, NO\textsubscript{x}, CO, Pb, other:</td>
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<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
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<tr>
<td>Describe the steps taken to mitigate the problem:</td>
<td></td>
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<tr>
<td>Describe the corrective actions/response steps taken:</td>
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<tr>
<td>Describe the measures taken to minimize emissions:</td>
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<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>
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Form Completed by: ________________________________
Title / Position: ________________________________
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: MetalX Auburn
Source Address: 1101 Oren Drive, Auburn, Indiana 46706
FESOP Permit No.: F033-40263-00110

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>
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<td>Response Steps Taken:</td>
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Form Completed by: ________________________________

Title / Position: ________________________________

Date: ________________________________

Phone: ________________________________
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>MetalX Auburn</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>1101 Oren Drive, Auburn, IN 46706</td>
</tr>
<tr>
<td>County:</td>
<td>Dekalb</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>5093 (Scrap and Waste Materials)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>F 033-40263-00110</td>
</tr>
<tr>
<td>Operation Permit Issuance Date:</td>
<td>November 8, 2018</td>
</tr>
<tr>
<td>Significant Permit Revision No.:</td>
<td>033-43479-00110</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>James Sperl</td>
</tr>
</tbody>
</table>

Existing Approvals

The source was issued FESOP No. 033-40263-00110 on November 8, 2018. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Dekalb County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</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>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. Dekalb 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
Dekalb 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) Other Criteria Pollutants
Dekalb 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.
Fugitive Emissions

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).

Greenhouse Gas (GHG) Emissions

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_4g18.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.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹, ₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>39.64</td>
<td>30.11</td>
<td>29.62</td>
<td>0.85</td>
<td>2.50</td>
<td>0.62</td>
<td>1.96</td>
<td>1.00</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>--</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a “regulated air pollutant.”
²PM₂.₅ listed is direct PM₂.₅.
*Fugitive HAP emissions are always included in the source-wide emissions.
(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 existing 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.

(c)  These emissions are based on the TSD of FESOP No. 033-40263-00110, issued on November 8, 2018.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by MetalX Auburn on November 18, 2020, relating to the replacement of two (2) primary shredders, each with a maximum capacity of 20 tons per hour, with a single primary shredder with a maximum capacity of 40 tons per hour.

The following is a list of the new emission units and pollution control device(s):

(a)  One (1) low speed, high torque Aluminum shredder system, identified as shredder, approved in 2021 for construction, with a maximum capacity of 40 tons per hour, using a baghouse as control, and exhausting outdoors and consisting of the following:

   (1)  One (1) shredder, identified as Primary Shredder

As part of this permitting action, the following emission units are being removed the permit:

(b)  One (1) low speed, high torque Aluminum shredder system, identified as shredder, approved in 2018 for construction, with a maximum capacity of 40,000 pounds per hour, using a baghouse as control, and exhausting indoors and consisting of the following:

   (1)  Two (2) shredders, identified as Primary Shredder 1 and Primary Shredder 2

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

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

Permit Level Determination – FESOP Significant Permit Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment


has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;X&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Shredder</td>
<td>438.00</td>
<td>438.00</td>
<td>438.00</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.95</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Units:</td>
<td>438.00</td>
<td>438.00</td>
<td>438.00</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.95</td>
</tr>
</tbody>
</table>

<sup>1</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
<sup>2</sup>Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants:

(i) PM, PM<sub>10</sub>, or direct PM<sub>2.5</sub>.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM&lt;sup&gt;1&lt;/sup&gt;</td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
</tr>
</tbody>
</table>

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take PM, PM<sub>2.5</sub>, and PM<sub>10</sub> limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this
source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset), and 326 IAC 2-8 (FESOP) for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

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

(a) The requirements of the New Source Performance Standard for Primary Aluminum Reduction Plants, 40 CFR 60, Subpart S and 326 IAC 12, are not included in the permit for this source, because this source is not a primary aluminum reduction plant as defined in 40 CFR 60.191. This plant shreds existing aluminum and other scrap metal.

(b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

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

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Aluminum Production, 40 CFR 63, Subpart RRR and 326 IAC 20-70 are not included in the permit for this source, since this source is not a secondary aluminum production facility as defined in section 40 CFR 63.1503.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries, 40 CFR 63, Subpart ZZZZZZ are not included in the permit for this source, since this source is not a foundry as defined in section 40 CFR 63.11556.

(c) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed revision.

**Compliance Assurance Monitoring (CAM):**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited 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

Due to this revision, state rule applicability has been reviewed as follows:

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**

PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.
PSD/EO Minor Source Limit(s)
In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The PM emissions from Primary Shredder shall not exceed 5.0 pounds per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The new emission unit(s) 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 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

FESOP PM10 and PM2.5 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), not applicable, the Permittee shall comply with the following:

(a) The PM$_{10}$ and PM$_{2.5}$ emissions from Primary Shredder shall not exceed 5.0 pounds per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 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.

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

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(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)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Dekalb County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Dekalb County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

Due to the proposed revision, state rule applicability has been reviewed as follows:

Primary Shredder

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the primary shredder, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the primary shredder shall not exceed 42.53 pounds per hour when operating at a process weight rate of 40 tons per hour. The pound per hour limitation was calculated with the following equation:

\[ E = 55.0 P^{0.11} - 40 \]

where \( E \) = rate of emission in pounds per hour; and
\( P \) = process weight rate in tons per hour

The baghouse shall be in operation at all times the primary shredder is in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this revision are as follows:

Testing Requirements:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>Timeframe for Testing or Date of Initial Valid Demonstration</th>
<th>Pollutant/Parameter</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Shredder</td>
<td>Baghouse</td>
<td>180**</td>
<td>PM</td>
<td>Every 5 years</td>
<td>326 IAC 2-2, 326 IAC 2-8-4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM10, PM2.5</td>
<td>Every 5 years</td>
<td>326 IAC 2-2, 326 IAC 2-8-4</td>
</tr>
</tbody>
</table>

** No later than 180 days after startup of the emission unit or completion of the modification.

(b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baghouse</td>
<td>Visible Emissions Notations</td>
<td>Daily</td>
<td>Verify whether emissions are normal or abnormal</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the baghouse for the primary shredder must operate properly to assure compliance with 326 IAC 2-8-4, 326 IAC 2-2 and 326 IAC 6-3-2.
Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

(1) The emissions unit description for the Aluminum shredder system in section A.2 and D.1 of the permit has been changed to reflect the new shredder being added

(2) Section D.1 of the permit has been updated to reflect the new Emission Limitations and Standards, Compliance Determination Requirements, Compliance Monitoring Requirements, and Record Keeping and Reporting Requirements for the new shredder being added

Additional Changes

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

(1) Section B - Annual Fee Payment of the permit has been revised as follows to include an updated phone number for the OAQ, Billing, Licensing, and Training Section:

(2) Effective June 8, 2019, the requirements of 326 IAC 14-10 (Emission Standards for Asbestos Demolition and Renovation Operations) were amended. Based on the amended rule, Section C.7 - Asbestos Abatement Projects of the permit has been revised as follows:

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:

... 

(c) One (1) low speed, high torque Aluminum shredder system, identified as shredder, approved in 2018 for construction, with a maximum capacity of 40,000 pounds per hour, using a baghouse as control, and exhausting indoors and consisting of the following:

(1) Two (2) shredders, identified as Primary Shredder 1 and Primary Shredder 2; 
   One (1) shredder, identified as Primary Shredder;
(2) Fifteen (15) conveyor belts;
(3) One (1) vibrating feeder;
(4) One (1) screener; and
(5) Three (3) eddy currents.

...

B.22 Annual Fee Payment [326 IAC 2-1.1-7]

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section) to determine the appropriate permit fee.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

*****

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2c).

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

*****
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) Wire Chopping Pre-Shredder System, constructed in 2014, with a maximum throughput capacity of 10 tons/hr, utilizing no control equipment, exhausting within the building, and consisting of:

(1) Six (6) Conveyors.

(b) One (1) Wire Chopping System, constructed in 2014, with a maximum throughput capacity of 4.5 tons/hr, utilizing a cyclone for particulate control, exhausting within the building, and consisting of:

(1) Twenty-eight (28) Conveyors;
(2) Two (2) Wire Choppers; and
(3) Three (3) Air Tables;

(c) One (1) low speed, high torque Aluminum shredder system, identified as shredder, approved in 2018 for construction approved in 2021 for construction, with a maximum capacity of 40,000 pounds per hour, using a baghouse as control, and exhausting indoors and consisting of the following:

(1) Two (2) shredders, identified as Primary Shredder 1 and Primary Shredder 2;
(2) One (1) shredder, identified as Primary Shredder;
(3) Fifteen (15) conveyor belts;
(4) One (1) vibrating feeder; and
(5) Three (3) eddy currents.

(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 and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The PM\textsubscript{10} and PM\textsubscript{2.5} emissions from Primary Shredder 1 and Primary Shredder 2 shall not exceed 5.0 pounds per hour.

Compliance with these limits, combined with the potential to emit PM\textsubscript{10} and PM\textsubscript{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM\textsubscript{10} and PM\textsubscript{2.5} to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The PM emissions from Primary Shredder 1 and Primary Shredder 2 shall not exceed 5.0 pounds per hour.

Compliance with these limits, combined with the potential to emit PM, from all other emission units at this source, shall limit the source-wide total potential to emit PM, to less than two-hundred fifty (250) tons per twelve (12) consecutive month period, each and shall render the requirements
of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The PM emissions from Primary Shredder shall not exceed 5.0 pounds per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit PM, to less than two-hundred fifty (250) tons per twelve (12) consecutive month period, each and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 FESOP and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The PM10 emissions from Primary Shredder shall not exceed 5.0 pounds per hour.

(b) The PM2.5 emissions from Primary Shredder shall not exceed 5.0 pounds per hour

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following emission units shall not exceed the emission rates in pounds per hour when operating at the process weight rates located in the table below:

<table>
<thead>
<tr>
<th>Emission Unit/Process</th>
<th>Emission Rate (lb/hr)</th>
<th>Process Weight Rate (tons/hour)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Shredders 1 and 2</td>
<td>30.51, each</td>
<td>20</td>
</tr>
<tr>
<td>Wire Chopping Pre-Shredder System</td>
<td>19.18</td>
<td>10</td>
</tr>
<tr>
<td>Wire Chop System</td>
<td>11.23</td>
<td>4.5</td>
</tr>
</tbody>
</table>

The pounds per hour limitation was calculated with the following equation:

\[ E = 4.10 P^{0.67} \]

Where \( E = \) rate of emission in pounds per hour, and \( P = \) process weight rate in tons per hour

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following emission units shall not exceed the emission rates in pounds per hour when operating at the process weight rates located in the table below:

<table>
<thead>
<tr>
<th>Emission Unit/Process</th>
<th>Emission Rate (lb/hr)</th>
<th>Process Weight Rate (tons/hour)</th>
<th>Equation Used</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Shredder</td>
<td>42.53</td>
<td>40</td>
<td>(b)</td>
</tr>
</tbody>
</table>
The pounds per hour limitation was calculated with the following equations:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

(a) \[ E = 4.10 P^{0.67} \]

Where \( E \) = rate of emission in pounds per hour; and \( P \) = process weight rate in tons per hour

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

(b) \[ E = 55.0 P^{0.11} - 40 \]

Where \( E \) = rate of emission in pounds per hour; and \( P \) = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

In order to assure compliance with Condition D.1.1 and D.1.2, the baghouse for particulate control shall be in operation and control emissions from the Primary Shredder 1 and Primary Shredder 2 facilities at all times the Primary Shredder 1 and/or Primary Shredder 2 facilities Primary Shredder facility at all times the Primary Shredder facility is in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

Not later than 180 days after the startup of Primary Shredder 1 and Primary Shredder 2 Primary Shredder, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouse stack exhaust utilizing methods approved by the commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

D.1.7 Visible Emissions Notations

(a) Visible emission notations of baghouse stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the baghouse(s) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

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

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 November 18, 2020.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 033-43479-00110. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact James Sperl, 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) 232-0459 or (800) 451-6027, and ask for James Sperl or (317) 232-0459.

(b) A copy of the findings is available on the Internet at: 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; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
Appendix A: Emission Calculations

PTE Summary

<table>
<thead>
<tr>
<th>Emission 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>
</tr>
</thead>
<tbody>
<tr>
<td>X Ray Line</td>
<td>0.99</td>
<td>0.26</td>
<td>0.35</td>
<td>--</td>
<td>--</td>
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</tr>
<tr>
<td>Primary Shredder</td>
<td>438.00</td>
<td>438.00</td>
<td>438.00</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.95</td>
</tr>
<tr>
<td>Shredder Conveyors</td>
<td>7.18</td>
<td>2.59</td>
<td>2.59</td>
<td>--</td>
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<tr>
<td>Wire Chopping Pre-Shredder System</td>
<td>2.42</td>
<td>2.01</td>
<td>2.01</td>
<td>--</td>
<td>--</td>
<td>--</td>
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</tr>
<tr>
<td>Wire Chop System</td>
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<td>0.49</td>
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</tr>
<tr>
<td>Storage Piles</td>
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<td>1.89E-03</td>
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<tr>
<td>Natural Gas Combustion</td>
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<td>0.17</td>
<td>0.01</td>
<td>2.27</td>
<td>0.12</td>
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<td>0.04</td>
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<tr>
<td>Diesel Heaters</td>
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<td>0.02</td>
<td>0.83</td>
<td>0.23</td>
<td>0.00</td>
<td>0.06</td>
<td>0.06E-05</td>
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</tr>
<tr>
<td>Paved Roads</td>
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<td><strong>Total</strong></td>
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* PM2.5 listed is direct PM2.5
**The Harris Baler does not produce any emissions due to the nature of the emission unit.

Potential to Emit after Control (tons/yr)

<table>
<thead>
<tr>
<th>Emission 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>
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<tbody>
<tr>
<td>X Ray Line</td>
<td>0.99</td>
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<td>0.35</td>
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<td>--</td>
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<td>--</td>
</tr>
<tr>
<td>Primary Shredder</td>
<td>21.90</td>
<td>21.90</td>
<td>21.90</td>
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<td>--</td>
<td>--</td>
<td>0.95</td>
</tr>
<tr>
<td>Shredder Conveyors</td>
<td>7.18</td>
<td>2.59</td>
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<td>--</td>
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<td>--</td>
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</tr>
<tr>
<td>Wire Chopping Pre-Shredder System</td>
<td>2.42</td>
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</tr>
<tr>
<td>Wire Chop System</td>
<td>3.45</td>
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<td>2.26</td>
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<tr>
<td>Storage Piles</td>
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</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.04</td>
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<td>2.27</td>
<td>0.12</td>
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<tr>
<td>Diesel Heaters</td>
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<td>0.02</td>
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<td>0.23</td>
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</tr>
<tr>
<td>Paved Roads</td>
<td>3.21</td>
<td>0.64</td>
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<tr>
<td><strong>Total</strong></td>
<td>39.64</td>
<td>30.11</td>
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* PM2.5 listed is direct PM2.5
**The Harris Baler does not produce any emissions due to the nature of the emission unit.

Potential to Emit after Issuance (tons/yr)

<table>
<thead>
<tr>
<th>Emission 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>
</tr>
</thead>
<tbody>
<tr>
<td>X Ray Line</td>
<td>0.99</td>
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<tr>
<td>Primary Shredder</td>
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<td>21.90</td>
<td>21.90</td>
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<td>--</td>
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<td>0.95</td>
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<tr>
<td>Shredder Conveyors</td>
<td>7.18</td>
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<tr>
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<td>--</td>
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<td>--</td>
</tr>
<tr>
<td>Wire Chop System</td>
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<td>2.26</td>
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<tr>
<td>Storage Piles</td>
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<tr>
<td>Natural Gas Combustion</td>
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<td>Diesel Heaters</td>
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<td>0.06E-05</td>
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<tr>
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</tr>
<tr>
<td>Paved Roads</td>
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<tr>
<td><strong>Total</strong></td>
<td>39.64</td>
<td>30.11</td>
<td>29.62</td>
<td>0.85</td>
<td>2.50</td>
<td>0.62</td>
<td>1.96</td>
<td>1.00</td>
</tr>
</tbody>
</table>

* PM2.5 listed is direct PM2.5
**The Harris Baler does not produce any emissions due to the nature of the emission unit.

Note: The shaded cells indicate where limits are included.
Appendix A: Emission Calculations
PTE Modification Summary

Company Name: MetalX Auburn
Address City IN Zip: 1101 Oren Drive, Auburn, IN 46706
Permit No./Plt ID: 033-43479-00110
Reviewer: James Sperl

<table>
<thead>
<tr>
<th>Emission 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>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Shredder</td>
<td>438.00</td>
<td>438.00</td>
<td>438.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.95</td>
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<td>Total</td>
<td>438.00</td>
<td>438.00</td>
<td>438.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.95</td>
</tr>
</tbody>
</table>

* PM2.5 listed is direct PM2.5
Appendix A: Emission Calculations

X Ray Line Potential Emissions

Company Name: MetalX Auburn
Address City IN Zip: 1101 Oren Drive, Auburn, IN 46706
Permit No./Plt ID: 033-43479-00110
Reviewer: James Spelt

<table>
<thead>
<tr>
<th>Process Description</th>
<th>Number of Emission Points</th>
<th>Maximum Capacity (tons/hr)</th>
<th>PM Emission Factor (lbs/ton)</th>
<th>PM10/PM2.5 Emission Factor (lbs/ton)</th>
<th>Uncontrolled Potential to Emit PM (lbs/hr)</th>
<th>Uncontrolled Potential to Emit PM (tons/yr)</th>
<th>Uncontrolled Potential to Emit PM10/PM2.5 (lbs/hr)</th>
<th>Uncontrolled Potential to Emit PM10/PM2.5 (tons/yr)</th>
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</thead>
<tbody>
<tr>
<td>Conveyor (C1)</td>
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<td>0.003</td>
<td>0.0011</td>
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<td>0.01</td>
<td>0.04</td>
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<tr>
<td>Conveyor (C2)</td>
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<td>0.003</td>
<td>0.0011</td>
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<td>0.04</td>
</tr>
<tr>
<td>Conveyor (C3)</td>
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<td>0.003</td>
<td>0.0011</td>
<td>0.02</td>
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<td>0.04</td>
</tr>
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<td>Conveyor (C4)</td>
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<td>0.0011</td>
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</tr>
<tr>
<td>Conveyor (C5)</td>
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<td>0.0011</td>
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<td>0.01</td>
<td>0.04</td>
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<td>0.0011</td>
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</tr>
<tr>
<td>Conveyor (C7)</td>
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<td>0.0011</td>
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<td>0.04</td>
</tr>
<tr>
<td>Vibratory Batch Feeder</td>
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<td>7.5</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.02</td>
<td>0.10</td>
<td>0.01</td>
<td>0.04</td>
</tr>
<tr>
<td>Vibratory Batch Feeder</td>
<td>1</td>
<td>7.5</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.02</td>
<td>0.10</td>
<td>0.01</td>
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</tr>
<tr>
<td><strong>Total</strong></td>
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<td></td>
<td></td>
<td></td>
<td><strong>0.23</strong></td>
<td><strong>0.99</strong></td>
</tr>
</tbody>
</table>

Notes:

*Emissions from conveying of Shredder System Conveyors are calculated using emission factors for crushed stone conveyor transfer points from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04)

No emission factor is identified for PM2.5 for dry conveying, therefore it is assumed PM10 = PM2.5

Methodology:

Uncontrolled Potential to Emit PM (lbs/hr) = Maximum Capacity (tons/hr) * PM Emission Factor (lbs/ton)
Uncontrolled Potential to Emit PM10/PM2.5 (lbs/hr) = Maximum Capacity (tons/hr) * PM10/PM2.5 Emission Factor (lbs/ton)

Uncontrolled Potential to Emit PM10/PM2.5 (tons/yr) = Uncontrolled Potential to Emit PM10/PM2.5 (lbs/hr) * 8760hr/1yr * 1ton/2000lbs
Appendix A: Emission Calculations

Primary Shredders Potential Emissions

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>MetalX Auburn</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address City</td>
<td>1101 Green Drive, Auburn, IN 46706</td>
</tr>
<tr>
<td>IN Zip:</td>
<td>033-43474-00110</td>
</tr>
<tr>
<td>Reviewer:</td>
<td>James Sperl</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Maximum Capacity</th>
<th>Emission Factor PM/PM10/PM2.5</th>
<th>Control Efficiency (lb/hr)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (ton/yr)</th>
<th>Controlled Potential to Emit PM/PM10/PM2.5 (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Shredder</td>
<td>40</td>
<td>2.5</td>
<td>95%</td>
<td>438</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td>21.9</td>
</tr>
</tbody>
</table>

Notes:
*Emission factor is a site-specific factor, provided by the source.

Methodology:
Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr) = Maximum Capacity (tons/hr) * Emission Factor PM/PM10/PM2.5 (lb/ton)
Controlled Potential to Emit PM/PM10/PM2.5 (lb/hr) = Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr) * (1-Control Efficiency (%))

HAP Emissions

<table>
<thead>
<tr>
<th>Pollutant Specifics</th>
<th>HAP's for Aluminum Processing</th>
<th>PM Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Aluminum Maximum Throughput (ton/hr)</td>
<td>Uncontrolled HAP Emissions (tons/hr)</td>
</tr>
<tr>
<td>Chromium</td>
<td>40</td>
<td>0.005%</td>
</tr>
<tr>
<td>Manganese</td>
<td>40</td>
<td>0.008%</td>
</tr>
<tr>
<td>Nickel</td>
<td>40</td>
<td>0.016%</td>
</tr>
<tr>
<td>Lead</td>
<td>40</td>
<td>0.008%</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>0.0045</td>
</tr>
</tbody>
</table>

Notes:
**HAP speciation data was obtained from US EPA Speciate 3.2 Database (Aluminum Processing) Number 2910130.
Aluminum Maximum Throughput (tons/hr) is the combined for Primary Shredder 1 and 2.

Methodology:
Uncontrolled HAP Emissions (tons/yr) = Total Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr) * PM Emissions (%) * (ton/2000lb)
Controlled HAP Emissions (tons/yr) = Uncontrolled HAP Emissions (tons/yr) * (1-Control Efficiency (%))

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<table>
<thead>
<tr>
<th>Process Description</th>
<th>Process Weight Rate (ton/hr) (P)</th>
<th>Rate of Emission (lb/hr) (E)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (ton/yr)</th>
<th>Control Needed to Comply?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Shredder</td>
<td>40</td>
<td>42.53</td>
<td>100</td>
<td>No</td>
</tr>
</tbody>
</table>

\[ E = 55.0 \times P^{0.11} - 40 \]

Where:
E = Rate of emission in pounds per hour
P = Process weight rate in tons per hour
## Appendix A: Emission Calculations
### Shredder Conveyors Potential Emissions

**Company Name:** MetalX Auburn  
**Address:** 1101 Orient Drive, Auburn, IN 46706  
**Permit No./PI ID:** 033-43479-00110  
**Reviewer:** James Spell

<table>
<thead>
<tr>
<th>Process Description</th>
<th>Number of Emission Points</th>
<th>Maximum Capacity (tons/hr)</th>
<th>PM Emission Factor* (lbs/ton)</th>
<th>PM10/PM2.5 Emission Factor (tons/hr)</th>
<th>Uncontrolled Potential to Emit PM (lb/hr)</th>
<th>Uncontrolled Potential to Emit PM10/PM2.5 (tons/hr)</th>
<th>Uncontrolled Potential to Emit PM10/PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conveyor Belt (3)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (4)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Vibrating Feeder (5)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Screener (6)</td>
<td>1</td>
<td>20</td>
<td>0.026</td>
<td>0.0087</td>
<td>0.5</td>
<td>2.19</td>
<td>0.174</td>
</tr>
<tr>
<td>Conveyor Belt (7)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (8)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (9)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (10)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Eddy Current (11)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (12)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (13)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Eddy Current (14)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (15)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (16)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Eddy Current (17)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (18)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (19)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (20)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Conveyor Belt (21)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
<tr>
<td>Eddy Current (22)</td>
<td>1</td>
<td>20</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.06</td>
<td>0.26</td>
<td>0.022</td>
</tr>
</tbody>
</table>

| Total               |                           |                             |                               |                                      | 1.64                                     | 7.18                                            | 2.59                                             |

Notes:
- Emissions from conveying of Shredder System Conveyors are calculated using emission factors for crushed stone conveyor transfer points from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04)
- No emission factor is identified for PM2.5 for dry conveying, therefore it is assumed PM10 = PM2.5
- Screener emission factor from AP-42 Chapter 11.19.2 Table 11.19.2-2 (SCC 3-05-003-02, 03)

Methodology:
- Uncontrolled Potential to Emit PM (lb/hr) = Maximum Capacity (tons/hr) * PM Emission Factor (lbs/ton)
- Uncontrolled Potential to Emit PM10/PM2.5 (lb/hr) = Maximum Capacity (ton/hr) * PM10/PM2.5 Emission Factor (lb/ton)

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\[ E = 4.10P^{0.67} \]

Where:
- \( E \) = Rate of emission in pounds per hour
- \( P \) = Process weight rate in tons per hour
Appendix A: Emission Calculations
Wire Chopping Pre-Shredder System

Company Name: MetalX Auburn
Address City  IN Zip: 1101 Oren Drive, Auburn, IN 46706
Permit No./Plt ID: 033-43479-00110
Reviewer: James Spell

Potential to Emit PM, PM10 and PM2.5
The following calculations determine the amount of emissions created by the Wire Chopping Pre-Shredder System.

<table>
<thead>
<tr>
<th>Process Description</th>
<th>Number of Emission Points</th>
<th>Maximum Capacity (tons/hr)</th>
<th>PM Emission Factor (lbs/ton)</th>
<th>PTE of PM (tons/year)</th>
<th>PM10 Emission Factor (lbs/ton)</th>
<th>PTE of PM10 (tons/year)</th>
<th>PM2.5 Emission Factor (lbs/ton)</th>
<th>PTE of PM2.5 (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wire Chopping Pre-Shredder System</td>
<td>1</td>
<td>10</td>
<td>0.0403</td>
<td>1.77</td>
<td>0.0403</td>
<td>1.77</td>
<td>0.0403</td>
<td>1.77</td>
</tr>
<tr>
<td>Grinder/Chopper</td>
<td>1</td>
<td>10</td>
<td>0.0030</td>
<td>0.13</td>
<td>0.0011</td>
<td>0.05</td>
<td>0.0011</td>
<td>0.05</td>
</tr>
<tr>
<td>Vibrating Conveyor</td>
<td>1</td>
<td>10</td>
<td>0.0030</td>
<td>0.26</td>
<td>0.0011</td>
<td>0.10</td>
<td>0.0011</td>
<td>0.10</td>
</tr>
<tr>
<td>Transfer Conveyors</td>
<td>2</td>
<td>10</td>
<td>0.0030</td>
<td>0.26</td>
<td>0.0011</td>
<td>0.10</td>
<td>0.0011</td>
<td>0.10</td>
</tr>
<tr>
<td>Crossbelt Conveyor</td>
<td>1</td>
<td>10</td>
<td>0.0030</td>
<td>0.13</td>
<td>0.0011</td>
<td>0.05</td>
<td>0.0011</td>
<td>0.05</td>
</tr>
<tr>
<td>Finish Conveyor</td>
<td>1</td>
<td>10</td>
<td>0.0030</td>
<td>0.13</td>
<td>0.0011</td>
<td>0.05</td>
<td>0.0011</td>
<td>0.05</td>
</tr>
</tbody>
</table>

Note: Emissions from conveying of scrap wire materials are calculated using emission factors for crushed stone conveyor transfer points from AP-42, Chapter 11.I. Table 11.19.2 (SEC 3-09-030-96 (B94)).

The particulate emission factor for the grinding/ripping is from the Institute of Scrap Recycling Industries, Inc. Title V Applicability Workbook Appendix D, Table D-10.E.

Methodology:
PTE of PM/PM10/PM2.5 (tons/year) = Number of Emission Points x Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hrs/year) x 1 ton/2000 lbs

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

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Where:
$E = 4.10P^{0.67}$

$E$ = Rate of emission in pounds per hour
$P$ = Process weight rate in tons per hour
### Appendix A: Emission Calculations

#### Wire Chop System Potential Emissions

**Company Name:** MetalX Auburn  
**Address City IN Zip:** 1101 Oren Drive, Auburn, IN 46706  
**Permit No./Plt ID:** 033-43479-00110  
**Reviewer:** James Sperl

**Potential to Emit PM, PM10 and PM2.5**

The following calculations determine the amount of emissions created by the Wire Chopping System.

<table>
<thead>
<tr>
<th>Process Description</th>
<th>Number of Emission Points</th>
<th>Maximum Capacity (tons/hr)</th>
<th>Emission Factor (lbs/ton)</th>
<th>Emission Potential (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Wire Chopping System</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td>Wire Chopper</td>
<td>2</td>
<td>4.5</td>
<td>0.0030</td>
<td>0.06</td>
</tr>
<tr>
<td><strong>Wire Chopping System Totals:</strong></td>
<td></td>
<td></td>
<td></td>
<td>3.45</td>
</tr>
</tbody>
</table>
| **Note:** Emissions from conveying of scrap wire materials are calculated using emission factors for crushed stone conveyor transfer points from AP-42, Chapter 11.19, Table 11.19-2 (SCC 3-05-020-06) (8/04). The particulate emission factor for the wire choppers is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.E. The particulate emission factor for the air tables is for crushed stone screening from AP-42, Chapter 11.19, Table 11.19-2 (SCC 3-05-020-06) (8/04). No emission factor is identified for PM2.5 for screening, therefore it is assumed PM10 = PM2.5. The particulate emission factor for the wire choppers is identified for PM2.5 for screening, therefore it is assumed PM2.5 = PM2.5. The particulate emission factor for the wire choppers is identified for PM2.5 for screening, therefore it is assumed PM2.5 = PM2.5. The particulate emission factor for the wire choppers is identified for PM2.5 for screening, therefore it is assumed PM2.5 = PM2.5. The particulate emission factor for the wire choppers is identified for PM2.5 for screening, therefore it is assumed PM2.5 = PM2.5.

**Methodology:**

\[
P = 4.10^p^{0.67}
\]

Where:

- \(E\) = Rate of emission in pounds per hour
- \(P\) = Process weight rate in tons per hour

**Abbreviations:**

- PM = Particulate Matter
- PM2.5 = Particulate Matter (<2.5 um)
- PM10 = Particulate Matter (<10 um)
- PTE = Potential to Emit

**326 IAC 6-3-2 Particulate Emission Limitations for Manufacturing Processes**

<table>
<thead>
<tr>
<th>Process Description</th>
<th>Process Weight Rate (ton/hr)</th>
<th>Emission Potential (ton/year)</th>
<th>Control Needed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wire Chop System</td>
<td>4.5</td>
<td>2.26</td>
<td>Yes</td>
</tr>
<tr>
<td>Wire Chop System</td>
<td>2.25</td>
<td>0.79</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Note:**

- Emissions from conveying of scrap wire materials are calculated using emission factors for crushed stone conveyor transfer points from AP-42, Chapter 11.19, Table 11.19-2 (SCC 3-05-020-06) (8/04).
Appendix A: Emission Calculations
Degreasing Potential Emissions

Company Name: MetalX Auburn  
Address City IN Zip: 1101 Oren Drive, Auburn, IN 46706  
Permit No./Pit ID: 033-43479-00110  
Reviewer: James Sperl

<table>
<thead>
<tr>
<th>Emission unit</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Annual Throughput of Solvent (Gals/yr)</th>
<th>Potential VOC (pounds per year)</th>
<th>Potential VOC (tons per year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Degreaser</td>
<td>6.7</td>
<td>100.0%</td>
<td>0.0%</td>
<td>145.0</td>
<td>971.50</td>
<td>0.49</td>
</tr>
</tbody>
</table>

**METHODOLOGY**
Potential VOC (Pounds per year) = Annual throughput of solvent (gals/year) * density (lbs/gal)
Potential VOC Tons per year) = Annual throughput of solvent (gals/year) * density (lbs/gal)/2000 (lbs/ton)
Appendix A: Emission Calculations
Gasoline Dispensing Potential Emissions

Company Name: MetaX Auburn
Address City IN Zip: 1101 Oren Drive, Auburn, IN 46706
Permit No./Pit ID: 033-43479-00110
Reviewer: James Sperl

To calculate evaporative emissions from the gasoline dispensing fuel transfer and dispensing operation emission factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids were used. The total potential emission of VOC is as follows:

\[
\text{Gasoline Throughput} = 1.64 \text{ gallons/day} \\
\text{Gasoline Throughput} = 0.60 \text{ kgal/yr}
\]

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Emission Factor (lb/kgal of throughput)*</th>
<th>PTE of VOC (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Filling storage tank (splash filling)</td>
<td>11.50</td>
<td>0.0035</td>
</tr>
<tr>
<td>Tank breathing and emptying</td>
<td>1.00</td>
<td>0.0003</td>
</tr>
<tr>
<td>Vehicle refueling (displaced losses - uncontrolled)</td>
<td>11.00</td>
<td>0.0033</td>
</tr>
<tr>
<td>Spillage</td>
<td>0.70</td>
<td>0.0002</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>0.01</strong></td>
</tr>
</tbody>
</table>


The potential to emit (PTE) Hazardous Air Pollutants (HAPs) were estimated using published gasoline data and assuming that the HAP % composition of the gasoline vapor is similar to the HAP % composition in liquid gasoline.

<table>
<thead>
<tr>
<th>Volatile Organic Compounds</th>
<th>HAP Content for Gasoline (% by weight)**</th>
<th>PTE of HAP (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,3-Butadiene</td>
<td>3.70E-5%</td>
<td>2.7E-07</td>
</tr>
<tr>
<td>2,2,4-Trimethylpentane</td>
<td>2.40%</td>
<td>1.7E-04</td>
</tr>
<tr>
<td>Benzene</td>
<td>1.90%</td>
<td>1.4E-04</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>1.70%</td>
<td>1.2E-04</td>
</tr>
<tr>
<td>Methyl-tert-butyl ether</td>
<td>0.33%</td>
<td>2.4E-05</td>
</tr>
<tr>
<td>Naphthalene</td>
<td>0.25%</td>
<td>1.8E-05</td>
</tr>
<tr>
<td>n-Hexane</td>
<td>2.40%</td>
<td>1.7E-04</td>
</tr>
<tr>
<td>Toluene</td>
<td>8.10%</td>
<td>5.9E-04</td>
</tr>
<tr>
<td>Total Xylenes</td>
<td>9.00%</td>
<td>6.5E-04</td>
</tr>
<tr>
<td><strong>Total PTE of HAPs (tons/yr)</strong></td>
<td></td>
<td><strong>6.5E-04</strong></td>
</tr>
</tbody>
</table>

Methodology
*Emission Factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids (dated 6/08), Table 5.2-7

http://www.aehsfoundation.org/Publications.aspx

The gasoline throughput was provided by the source.

\[
\text{PTE of VOC (tons/yr)} = \text{[Gasoline Throughput (kgal/yr)]} \times \text{[Emission Factor (lb/kgal)]} \times \text{[ton/2000 lb]}
\]

**Abbreviations**

VOC = Volatile Organic Compounds
HAP = Hazardous Air Pollutant
PTE = Potential to Emit
Appendix A: Emission Calculations

Storage Piles Potential Emissions

Company Name: MetalX Auburn
Address City IN Zip: 1101 Oren Drive, Auburn, IN 46706
Permit No./Plt ID: 033-43479-00110
Reviewer: James Sperl

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

\[
Ef = 1.7*(s/1.5)*(365-p)/235*(f/15)
\]

where
- \( Ef \) = emission factor (lb/acre/day)
- \( s \) = silt content (wt %)
- \( p \) = 125 days of rain greater than or equal to 0.01 inches
- \( f \) = 15% of wind greater than or equal to 12 mph

<table>
<thead>
<tr>
<th>No. Piles</th>
<th>Description of Material</th>
<th>Silt Content (wt %)</th>
<th>Emission Factor (lb/acre/day)</th>
<th>Maximum Anticipated Pile Size (acres)</th>
<th>PTE of PM (tons/yr)</th>
<th>PTE of PM10 (tons/yr)</th>
<th>PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Auto Shredder Residue (outdoors)</td>
<td>1</td>
<td>1.16</td>
<td>1.00</td>
<td>0.21</td>
<td>0.07</td>
<td>0.07</td>
</tr>
<tr>
<td>5</td>
<td>Insulated Copper Wire (indoors)</td>
<td>1</td>
<td>1.16</td>
<td>0.50</td>
<td>0.11</td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td>8</td>
<td>Al., Stainless steel, Cu. (indoors)</td>
<td>1</td>
<td>1.16</td>
<td>0.500</td>
<td>0.11</td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.42</td>
<td>0.15</td>
<td>0.15</td>
</tr>
</tbody>
</table>

Methodology

- \( PTE \) of PM (tons/yr) = [Emission Factor (lb/acre/day)] * [Maximum Pile Size (acres)] * (ton/2000 lbs) * (8760 hours/yr)
- \( PTE \) of PM10 (tons/yr) = [Potential PM Emissions (tons/yr)] * 35%

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

*Silt content values assumed to be negligible.
*Pile size is the combined acreage for all piles of the material(s) described.
### Emissions Calculations

**Natural Gas Combustion Only**

**Company Name:** MetalX Auburn  
**Address City IN Zip:** 1101 Oren Drive, Auburn, IN 46706  
**Permit No./Plt ID:** 033-43479-00110  
**Reviewer:** James Sperl

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Number of Units</th>
<th>MMBtu/hr</th>
<th>Total MMBtu/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roof Top Furnace Units</td>
<td>5</td>
<td>0.15</td>
<td>0.75</td>
</tr>
<tr>
<td>2</td>
<td>0.2</td>
<td>0.4</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>0.35</td>
<td>0.35</td>
<td></td>
</tr>
<tr>
<td>Radiant Heaters</td>
<td>1</td>
<td>0.055</td>
<td>0.055</td>
</tr>
<tr>
<td>Production Area</td>
<td>2</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Maintenance &amp; Parts Areas</td>
<td>8</td>
<td>0.2</td>
<td>1.6</td>
</tr>
<tr>
<td>Heaters</td>
<td>1</td>
<td>0.12</td>
<td>0.12</td>
</tr>
</tbody>
</table>

**Total:** 20, 5.275

### Heat Input Capacity

<table>
<thead>
<tr>
<th>MMBtu/hr</th>
<th>mmBtu</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.3</td>
<td>1020</td>
<td>45.3</td>
</tr>
</tbody>
</table>

### Pollutant Emission Factors

- **PM** emission factor is filterable PM only. **PM10** emission factor is filterable and condensable PM10 combined. **PM2.5** emission factor is filterable and condensable PM2.5 combined.
- **NOx** emission factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing. 

**MMBtu = 1,000,000 Btu**  
**MMCF = 1,000,000 Cubic Feet of Gas**

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in tons/yr</td>
<td>4.8E-05</td>
<td>2.7E-05</td>
<td>1.7E-03</td>
<td>0.04</td>
<td>7.7E-05</td>
<td></td>
<td></td>
<td>0.04</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in tons/yr</td>
<td>1.1E-05</td>
<td>2.5E-05</td>
<td>3.2E-05</td>
<td>8.6E-06</td>
<td>4.8E-05</td>
<td>1.2E-04</td>
</tr>
</tbody>
</table>

**Methodology** is the same as above.  
The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: MetalX Auburn
Address City IN Zip: 1101 Oren Drive, Auburn, IN 46706
Permit No./Plt ID: 033-43479-00110
Reviewer: James Sperl

### Emission Units

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>MMBtu/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shipping Heater</td>
<td>0.125</td>
</tr>
<tr>
<td>Receiving Heater</td>
<td>0.125</td>
</tr>
<tr>
<td>Chopping Line Heater</td>
<td>0.125</td>
</tr>
<tr>
<td>Total</td>
<td>0.375</td>
</tr>
</tbody>
</table>

### Heat Input Capacity Potential Throughput

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>MMBtu/hr</th>
<th>kgals/year</th>
<th>S = Weight % Sulfur</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shipping Heater</td>
<td>0.125</td>
<td>23.5</td>
<td>0.5</td>
</tr>
<tr>
<td>Receiving Heater</td>
<td>0.125</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chopping Line Heater</td>
<td>0.125</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>0.375</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu
Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

**PM10 emission factor is filterable PM only.**
**PM2.5 emission factor is filterable PM2.5 of 0.83 lb/kgal + condensable PM emission factor of 1.3 lb/kgal.**
**Direct PM2.5 emission factor is filterable PM2.5 of 0.83 lb/kgal + condensable PM emission factor of 1.3 lb/kgal.**
Emission (tons/yr) = Throughput (kgals/yr)*Emission Factor (lb/kgal)/2,000 lb/ton

### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/kgal</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>2.0</td>
<td>0.02</td>
</tr>
<tr>
<td>PM10**</td>
<td>2.38</td>
<td>0.03</td>
</tr>
<tr>
<td>PM2.5***</td>
<td>2.13</td>
<td>0.02</td>
</tr>
<tr>
<td>SO2</td>
<td>71</td>
<td>0.83</td>
</tr>
<tr>
<td>NOx</td>
<td>20.0</td>
<td>0.23</td>
</tr>
<tr>
<td>VOC</td>
<td>0.34</td>
<td>0.00</td>
</tr>
<tr>
<td>CO</td>
<td>5.0</td>
<td>0.06</td>
</tr>
</tbody>
</table>

** PM emission factor is filterable PM only.
** PM10 emission factor is filterable PM10 of 1.08 lb/kgal + condensable PM emission factor of 1.3 lb/kgal.
** PM2.5 emission factor is filterable PM2.5 of 0.83 lb/kgal + condensable PM emission factor of 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/yr)*Emission Factor (lb/kgal)/2,000 lb/ton

### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/mmBtu</th>
<th>Arsenic</th>
<th>Beryllium</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Lead</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>4.0E-06</td>
<td>3.0E-06</td>
<td>3.0E-06</td>
<td>3.0E-06</td>
<td>9.0E-06</td>
</tr>
</tbody>
</table>

### HAPs - Metals (continued)

<table>
<thead>
<tr>
<th>Emission Factor in lb/mmBtu</th>
<th>Mercury</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Selenium</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>3.0E-06</td>
<td>6.0E-06</td>
<td>3.0E-06</td>
<td>1.5E-05</td>
</tr>
</tbody>
</table>

### Methodology

No data was available in AP-42 for organic HAPs.
POTENTIAL EMISSIONS (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton
### Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

#### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Straight Truck 5-Axle Scrap Hauler (Empty)</td>
<td>20.0</td>
<td>1.0</td>
<td>20.0</td>
<td>19.0</td>
<td>280.0</td>
<td>400</td>
<td>0.796</td>
<td>1.5</td>
</tr>
<tr>
<td>Straight Truck 5-Axle Scrap Hauler (Loaded)</td>
<td>20.0</td>
<td>1.0</td>
<td>20.0</td>
<td>45.0</td>
<td>900.0</td>
<td>400</td>
<td>0.796</td>
<td>1.5</td>
</tr>
<tr>
<td>Roll-Off Truck 5-Axle Scrap Hauler (Empty)</td>
<td>15.0</td>
<td>1.0</td>
<td>15.0</td>
<td>19.0</td>
<td>285.0</td>
<td>600</td>
<td>0.114</td>
<td>1.7</td>
</tr>
<tr>
<td>Roll-Off Truck 5-Axle Scrap Hauler (Full)</td>
<td>15.0</td>
<td>1.0</td>
<td>15.0</td>
<td>45.0</td>
<td>875.0</td>
<td>600</td>
<td>0.114</td>
<td>1.7</td>
</tr>
</tbody>
</table>

**Totals**

<p>| | | | | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Average Vehicle Weight Per Trip</td>
<td>32.0</td>
<td></td>
<td>0.05</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Miles Per Trip</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Unmitigated Emission Factor, \( E \) = \left[ k \ast \left( \frac{sL}{100} \right)^{0.91} \ast \left( \frac{W}{100} \right)^{1.02} \right] \quad (Equation 1 from AP-42 13.2.1)**

where 

\[ k = 0.011 \quad PM \]

\[ k = 0.0022 \quad PM_{10} \quad PM_{2.5} \]

\[ W = 32.0 \quad 32.0 \quad 32.0 \quad \text{tons/trip} \]

\[ sL = 9.7 \quad 9.7 \quad 9.7 \quad \text{g/m}^2 \]

Taking natural mitigation due to precipitation into consideration, **Mitigated Emission Factor, \( E_{\text{ext}} \) = \( E \ast \left[ 1 - \left( \frac{p}{4N} \right) \right] \) (Equation 2 from AP-42 13.2.1)**

where 

\[ p = 125 \quad \text{days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)} \]

\[ N = 365 \quad \text{days/year} \]

**Mitigated Emission Factor, \( E_{\text{ext}} \) = 2.983 \quad 0.597 \quad 0.1464 \quad \text{lb/mile} \]

**Mitigated Emission Factor, \( E_{\text{ext}} \) = 2.727 \quad 0.545 \quad 0.1339 \quad \text{lb/mile} \]

**Mitigated PTE (Before Control) (tons/yr)**

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Straight Truck 5-Axle Scrap Hauler (Empty)</td>
<td>0.75</td>
<td>0.15</td>
<td>0.04</td>
</tr>
<tr>
<td>Straight Truck 5-Axle Scrap Hauler (Loaded)</td>
<td>0.75</td>
<td>0.15</td>
<td>0.04</td>
</tr>
<tr>
<td>Roll-Off Truck 5-Axle Scrap Hauler (Empty)</td>
<td>0.68</td>
<td>0.17</td>
<td>0.04</td>
</tr>
<tr>
<td>Roll-Off Truck 5-Axle Scrap Hauler (Full)</td>
<td>0.68</td>
<td>0.17</td>
<td>0.04</td>
</tr>
</tbody>
</table>

**Totals**

<p>| | | | | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Weight driven per day (ton/day)</td>
<td>= [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]</td>
<td>PM = Particulate Matter</td>
<td>PM10 = Particulate Matter (&lt;10 um)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maximum one-way distance (feet/trip)</td>
<td>= [Maximum one-way distance (feet/trip)] / [5280 ft/mile]</td>
<td>PM2.5 = Particle Matter (&lt;2.5 um)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maximum one-way miles (miles/day)</td>
<td>= [Maximum one-way miles (miles/day)] / 5280</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Vehicle Weight Per Trip (ton.trip)</td>
<td>= [Average Vehicle Weight Per Trip (ton/trip)] / [Average Miles Per Trip (miles/trip)]</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Miles Per Trip (miles/trip)</td>
<td>= [Average Vehicle Weight Per Trip (ton/trip)] * [Average Miles Per Trip (miles/trip)]</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maximum one-way miles (miles/yr)</td>
<td>= [Maximum one-way miles (miles/day)] * [365 days/year]</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mitigated PTE (Before Control) (tons/yr)</td>
<td>= [Mitigated one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mitigated PTE (After Control) (tons/yr)</td>
<td>= [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Neal Rifkin  
MetalX Auburn LLC  
295 S Commerce Dr  
Waterloo, IN  46793

Re: Public Notice  
MetalX Auburn LLC  
Permit Level: FESOP Sig Permit Rev Minor PSD  
Permit Number: 033-43479-00110

Dear Mr. Rifkin:

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 43479

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 Eckhart Public Library, 603 South Jackson Street in Auburn, IN. 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 James Sperl, 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 2-0459 or dial (317) 232-0459.

Sincerely,

Theresa Weaver
Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 25, 2021
To: Eckhart Public Library

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: MetalX Auburn LLC
Permit Number: 033-43479-00110

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

January 25, 2021

MetalX Auburn LLC
033-43479-00110

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

### IDEM Staff

**TAWEAVER**

**Metal X Auburn 033-43479-00110 (draft)**

**January 25, 2021**

**Type of Mail:**

**CERTIFICATE OF MAILING ONLY**

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<td>Mr. Frank Ring CJF Associates, LLC P.O. Box 80815 Saint Clair Shores MI 48080 (Consultant)</td>
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