

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Reclaimers, Inc.
Intersection of US Highway 6 and County Road 400 E
Kendallville, IN 46755**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 113-11024-00037	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a scrap wire copper reclamation operation

Authorized Individual: Don Boyer
Source Address: Intersection of US 6 West and CR 400 E, Kendallville, IN 46755
Mailing Address: P. O. Box 97, Kendallville, IN 46755
Phone Number: 219-347-5610
SIC Code: 5093
County Location: Noble
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD or Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) one (1) 48" scrap wire process line, with a maximum throughput rate of 6,052 pounds of scrap wire per hour, including:
 - (1) one (1) Triple S shredder, identified as 48-1, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (2) one (1) Triple S primary granulator, identified as 48-2, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (3) two (2) Triple S secondary granulators, identified as 48-3 and 48-4, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (4) one (1) Triple S screening unit, identified as 48-5, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (5) one (1) Triple S gravity separation unit, identified as 48-6, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (6) one (1) final screening unit, identified as 48-7, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1; and
 - (7) one (1) rechop granulator, identified as 48-8, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1.
- (b) one (1) 24" scrap wire process line, with a maximum throughput rate of 1,767 pounds of scrap wire per hour, including:

- (1) one (1) Triple S shredder, identified as 24-1, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (2) one (1) Triple S primary granulator, identified as 24-2, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (3) one (1) Triple S secondary granulator, identified as 24-3, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (4) one (1) Triple S screening unit, identified as 24-4, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (5) one (1) Triple S gravity separation unit, identified as 24-5, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2; and
 - (6) one (1) rechop granulator, identified as 24-6, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2.
- (c) one (1) bulk insulation waste storage silo with a maximum throughput of 13,175 tons per year.
- (d) the following combustion units:
- (1) one (1) 1.96 MMBtu/hr natural gas fired air make up unit, identified as MA;
 - (2) two (2) 0.07 MMBtu/hr natural gas fired radiant space heaters, identified as R2 and R3;
 - (3) two (2) 0.4 MMBtu/hr natural gas fired enclosed space heaters, identified as H1 and H2;
 - (4) one (1) 0.15 MMBtu/hr natural gas fired enclosed space heater, identified as H3;
 - (5) one (1) 0.15 MMBtu/hr natural gas fired enclosed space heater, identified as R1; and
 - (6) two (2) 0.08 MMBtu/hr natural gas fired radiant space heaters, identified as R4 and R5.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is not a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is not an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);
- (c) It is not a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit 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.

B.2 Definitions

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding Condition B.7, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emissions units were constructed as proposed in the application. The emissions units covered in the Construction Permit may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete 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. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
 - (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;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of [326 IAC 2-6.1-6] 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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.8 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). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.11 Maintenance of Monitoring Equipment [IC 13-14-1-13]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported.
All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a semi-annual Compliance Monitoring Report.

Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

One (1) scrap wire copper reclamation operation, including the following:

- (a) one (1) 48" scrap wire process line, with a maximum throughput rate of 6,052 pounds of scrap wire per hour, including:
 - (1) one (1) Triple S shredder, identified as 48-1, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (2) one (1) Triple S primary granulator, identified as 48-2, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (3) two (2) Triple S secondary granulators, identified as 48-3 and 48-4, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (4) one (1) Triple S screening unit, identified as 48-5, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (5) one (1) Triple S gravity separation unit, identified as 48-6, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (6) one (1) final screening unit, identified as 48-7, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1; and
 - (7) one (1) re chop granulator, identified as 48-8, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1.
- (b) one (1) 24" scrap wire process line, with a maximum throughput rate of 1,767 pounds of scrap wire per hour, including:
 - (1) one (1) Triple S shredder, identified as 24-1, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (2) one (1) Triple S primary granulator, identified as 24-2, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (3) one (1) Triple S secondary granulator, identified as 24-3, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (4) one (1) Triple S screening unit, identified as 24-4, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (5) one (1) Triple S gravity separation unit, identified as 24-5, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2; and
 - (6) one (1) re chop granulator, identified as 24-6, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2.
- (c) one (1) , bulk insulation waste storage silo with a maximum throughput of 13,175 tons per year.

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the 24" and 48" process line facilities shall not exceed 10.2 pounds per hour when operating at a process weight rate of 3.9 tons per hour.

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

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the 24" and 48" process lines and their respective control devices.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

The 24" and 48" process line PM control devices shall be in operation at all times when the process lines are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the 24" and 48" process line stacks (E1 and E2) shall be performed during normal daylight operations when exhausting to the atmosphere. 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.

The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the emissions from the 24" and 48" process lines when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the 24" and 48" process line stack exhaust.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A semi-annual summary of the information to document compliance with Conditions D.1.5 and D.1.6 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

the following combustion units:

- (1) one (1) 1.96 MMBtu/hr natural gas fired air make up unit, identified as MA;
- (2) two (2) 0.07 MMBtu/hr natural gas fired radiant space heaters, identified as R2 and R3;
- (3) two (2) 0.4 MMBtu/hr natural gas fired enclosed space heaters, identified as H1 and H2;
- (4) one (1) 0.15 MMBtu/hr natural gas fired enclosed space heater, identified as H3;
- (5) one (1) 0.15 MMBtu/hr natural gas fired enclosed space heater, identified as R1; and
- (6) two (2) 0.08 MMBtu/hr natural gas fired radiant space heaters, identified as R4 and R5.

Emission Limitations and Standards

There are no limitations or standards that apply to the combustion units of this section.

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N
THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. (_____)

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____

INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ ____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ ____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Reclaimers, Inc.
Source Address: Intersection of US 6 West and CR 400 E, Kendallville, IN 46755
Mailing Address: P.O. Box 97, Kendallville, IN 46755
MSOP 70 Permit No.: 113-11024-00037

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Reclaimers, Inc.
Source Location: Intersection of US 6 West and CR 400E, Kendallville, IN 46755
County: Noble
SIC Code: 5093
Operation Permit No.: 113-11024-00037
Permit Reviewer: SDF

The Office of Air Management (OAM) has reviewed an application from Reclaimers, Inc. relating to the permit renewal for a scrap wire copper reclamation operation, including the following:

- (a) one (1) 48" scrap wire process line, with a maximum throughput rate of 6,052 pounds of scrap wire per hour, including:
- (1) one (1) Triple S shredder, identified as 48-1, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (2) one (1) Triple S primary granulator, identified as 48-2, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (3) two (2) Triple S secondary granulators, identified as 48-3 and 48-4, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (4) one (1) Triple S screening unit, identified as 48-5, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (5) one (1) Triple S gravity separation unit, identified as 48-6, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1;
 - (6) one (1) final screening unit, identified as 48-7, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1; and
 - (7) one (1) rechop granulator, identified as 48-8, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 48-9 and 48-10, respectively, with emissions exhausted to Stack E1.
- (b) one (1) 24" scrap wire process line, with a maximum throughput rate of 1,767 pounds of scrap wire per hour, including:
- (1) one (1) Triple S shredder, identified as 24-1, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (2) one (1) Triple S primary granulator, identified as 24-2, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;

- (3) one (1) Triple S secondary granulator, identified as 24-3, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (4) one (1) Triple S screening unit, identified as 24-4, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2;
 - (5) one (1) Triple S gravity separation unit, identified as 24-5, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2; and
 - (6) one (1) rechop granulator, identified as 24-6, with PM/PM10 emissions exhausted to a cyclone/baghouse combination, identified as 24-7 and 24-8, respectively, with emissions exhausted to Stack E2.
- (c) one (1) bulk insulation waste storage silo with a maximum throughput of 13,175 tons per year.
- (d) the following combustion units:
- (1) one (1) 1.96 MMBtu/hr natural gas fired air make up unit, identified as MA;
 - (2) two (2) 0.07 MMBtu/hr natural gas fired radiant space heaters, identified as R2 and R3;
 - (3) two (2) 0.4 MMBtu/hr natural gas fired enclosed space heaters, identified as H1 and H2;
 - (4) one (1) 0.15 MMBtu/hr natural gas fired enclosed space heater, identified as H3;
 - (5) one (1) 0.15 MMBtu/hr natural gas fired enclosed space heater, identified as R1; and
 - (6) two (2) 0.08 MMBtu/hr natural gas fired radiant space heaters, identified as R4 and R5.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

Construction Permit CP 113-3152-00037 Issued 03-02-1994

All conditions from previous approvals were incorporated into this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
E1	48" Line Baghouse	12	2	24400	ambient
E2	24" Line Baghouse	12	2	17900	ambient
E3	Ventilation	1	2	7400	ambient
E4	Ventilation	1	2	7400	ambient

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on June 1, 1999.

Emission Calculations

Unrestricted Potential to Emit (PTE):

1. Emissions from the 24" and 48" Process Lines and Storage Silo:

The unrestricted PTE emissions from the process lines are estimated based on the following information provided by the applicant:

- a. 0.45% of the particulate matter is less than 1000 microns,
- b. 60% of the waste to the cyclones is PCV
- c. PVC waste contains 3% lead and 1% Antimony, and
- d. Each line control system has four (4) cyclones in series.

The 24 inch process line processes 1767 lb/hr of scrap insulated wire into 1088.3 lbs/hour of copper and 678.7 lbs/hour of scrap (644.76 lbs of primary scrap, and 33.94 lbs from rechop granulator).

The 48 inch process line processes 6025 lb/hr scrap insulated copper into 3719.7 lbs/hour of copper and 2332.3 lbs/hour (2215.68 lbs of primary scrap, and 116.63 lbs from the rechop granulator)

Total Copper Material Reclaimed (lb/hr):

1088.3 lbs/hr from the 24" line and 3179.7 lbs from the 48" line = 4808 lbs/hr.

Total Waste Material to the Cyclones (lb/hr):

678.7 (24"line) + 2332.3 (48"line) = 3011 lbs/hr waste.

Particulate Matter (less than 100 microns in size) in the Waste (ton/yr):

$3011 \text{ lb/hr} * 0.45/100 = 13.55 \text{ lbs/hr}$,
 $13.55 \text{ lbs/hr} * 24 \text{ hrs/day} = 325.2 \text{ lbs/24 hrs}$, and
 $13.55 \text{ lbs/hr} * 8760 \text{ hrs/yr}/2000 \text{ lbs/ton} = 59.35 \text{ tons/year}$.

PM is determined to be equal to PM10 in this case.

Amount of Material Lost From the Cyclones:

Total material collected in the cyclones for waste disposal will be 2330 lb/hr (48" line) and 678 (24" line) = total of 3008 lbs/hr.

The amount of material that will be lost from the cyclone =

$3011 \text{ lb/hr to cyclone} - 3008 \text{ lbs/hr to waste disposal} = 3 \text{ lbs/hr}$,
 $3 \text{ lbs/hr} * 24 \text{ hrs/day} = 72 \text{ lbs/24 hrs}$, and
 $3 \text{ lbs/hr} * 8760 \text{ hrs/yr}/2000 \text{ lbs/ton} = 13.14 \text{ tons/year}$.

Material from the cyclones will pass through filter screens to capture all the material. The material captured by the filters is sent to a storage silo and then on to a waste processing operation where the waste process operation stabilizes lead in the waste before disposal as special waste. This process is proprietary, and per the consultant, it has no emissions.

2. Combustion Emissions:

The following table lists the combustion unit unrestricted PTE as determined using the standard combustion spreadsheets. The detailed calculations are found in Appendix A.

Unit	PM ton/yr	PM10 ton/yr	SO2 ton/yr	NOx ton/yr	VOC ton/yr	CO ton/yr
MA	neg.	0.1	neg.	0.9	neg.	0.7
R2 and R3	neg.	neg.	neg.	0.1	neg.	0.1
H1 and H2	neg.	neg.	neg.	0.4	neg.	0.3
H3	neg.	neg.	neg.	neg.	neg.	neg.
R1	neg.	neg.	neg.	0.1	neg.	0.1
R4 and R5	neg.	neg.	neg.	0.1	neg.	0.1
Total	neg.	0.1	neg.	1.6	neg.	1.3

Emissions After Controls:

1. Emissions from the 24" and 48" Process Lines and Storage Silo:

Material passing through the baghouse based on figures from the application:

$$0.00315 \text{ (24"line)} + 0.01035 \text{ (48"line)} = 0.01665 \text{ lbs/hr after the screen,}$$

$$0.01665 * 24 \text{ hr/day} = 0.4 \text{ lbs/24 hrs, and}$$

$$0.01665 * 8760 \text{ hrs/yr} / 2000 \text{ lbs/ton} = 0.073 \text{ tons/year.}$$

2. Combustion Emissions:

The combustion units are uncontrolled. The potential emissions after controls equals the unrestricted potential to emit.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions 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, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	59.35
PM-10	59.36

SO ₂	neg.
VOC	neg.
CO	1.3
NO _x	1.6

HAP's	Potential To Emit (tons/year)
antimony compounds	0.0004
lead compounds	0.0009
TOTAL	0.0013

- (a) The potential to emit before controls of particulate matter (PM) and PM10 are equal to or greater than 25 tons per year but less than 100 tons per year. Therefore, the source is subject to the Minor Source Operating Permit (MSOP) provisions of 326 IAC 2-6.1.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM-10	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Noble County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.07
PM10	0.07
SO ₂	neg.
VOC	neg.
CO	1.3
NO _x	1.6
Single HAP	0.0009
Combination HAPs	.0013

This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3 because the allowable emissions 10.2 lb PM/hr, are greater than the applicable level of 10 lb/hr. Pursuant to this rule, the source shall have a preventive maintenance plan that meets the requirements of 326 IAC 1-6-3.

326 IAC 5-1 (Visible Emissions Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The 24" and 48" process lines are subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the 24" and 48" process lines shall be limited to 10.2 lb/hr, based on a maximum process weight rate of 3.9 ton/hr.

$$E = 4.10 P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The baghouse/cyclone combination for the 24" and 48" process lines shall be in operation at all times the process lines are in operation, in order to comply with this limit.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The renewal of this scrap wire copper reclamation operation shall be subject to the conditions of the attached proposed Minor Source Operating Permit 113-11024-00037.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Reclaimers, Inc.
Address City: Intersection of US 6 West and CR 400E, Kendallville, IN 46755
CP: 113-11024
Plt ID: 113-00037
Reviewer: SDF
Date: 06-04-99

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

0.1

1.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.1	0.0	0.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

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Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

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CP: 113-11024
Plt ID: 113-00037
Reviewer: SDF
Date: 06-04-99

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

0.8

7.0

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.4	0.0	0.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

See page 2 for HAPs emissions calculations.

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MM BTU/HR <100
Small Industrial Boiler

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CP: 113-11024

Plt ID: 113-00037

Reviewer: SDF

Date: 06-04-99

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.0

0.4

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0	0.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

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MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

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Natural Gas Combustion Only
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Plt ID: 113-00037
Reviewer: SDF
Date: 06-04-99

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.2

1.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.1	0.0	0.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

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MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

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MM BTU/HR <100
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CP: 113-11024
Plt ID: 113-00037
Reviewer: SDF
Date: 06-04-99

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

0.2

1.4

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.1	0.0	0.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

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CP: 113-11024
Plt ID: 113-00037
Reviewer: SDF
Date: 06-04-99

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.0

17.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	0.9	0.0	0.7

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

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