



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: March 27, 2006
RE: VIM Recycling, Inc. / 039-19895-00538
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mr. Kenneth Will
VIM Recycling, Inc.
29861 Old U.S. Highway 33
Elkhart, Indiana 46516

March 27, 2006

Re: 039-19895-00538
Minor Permit Modification to:
Part 70 Permit No.: T039-15593-00538

Dear Mr. Will:

VIM Recycling, Inc. was issued a permit on January 24, 2003 for a stationary operation that manufactures landscape mulch, animal bedding, and wood for fuel using recycled wood as raw material. A letter requesting changes to this permit was received on October 25, 2004. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

- (a) Construction of one (1) new Haybuster wood grinder, using a screen separator at a maximum grinding capacity of twenty-five (25) tons of "recently live" wood per hour and shall be operated by an existing 312 horsepower diesel engine. The particulate emissions from the Haybuster wood grinder shall be controlled as described in the existing Fugitive Dust Control Plan approved by IDEM, OAQ on July 17, 2000.
- (b) Deletion of Conditions D.1.3 and D.2.3 (Storage Piles) used in conjunction with the Agreed Orders 2000-9603-A and 2000-9849-A, signed August 23, 2001, which were erroneously incorporated for the Elkhart facility. These conditions apply only for the Goshen facility.
- (c) IDEM, OAQ has also revised Condition C.19 to be consistent with the requirements in the recently revised 326 IAC 2-6 (Emission Reporting).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Paul Dubenetzky, Branch Chief
Office of Air Quality

Attachments

ERG/SD

cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Tony Pelath
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner





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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**VIM Recycling, Inc.
29861 Old U.S. Highway 33
Elkhart, Indiana 46516**

(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.

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 2-7 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.

Operation Permit No.: T039-15593-00538	
Original Signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: January 24, 2003 Expiration Date: January 23, 2008
First Minor Permit Modification No.: 039-19895-00538	Page Affected: 5, 6, 26-34, 38
Issued by: Original signed by Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: March 27, 2006



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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 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary operation that manufactures landscape mulch, animal bedding, and wood for fuel, using recycled wood as raw material.

Responsible Official:	President
Source Address:	29861 Old U.S. Highway 33, Elkhart, Indiana 46516
Mailing Address:	29861 Old U.S. Highway 33, Elkhart, Indiana 46516
General Source Phone Number:	(574) 642-3677
SIC Code:	2499
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, under Nonattainment NSR Rules; Minor Source, under Section 112 of the Clean Air Act; Not 1 of the 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) CBI wood grinder and screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 1X, including associated storage piles;
- (b) One (1) "B" and "C" material transporter and screen, identified as B, C Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 2X, including associated storage piles;
- (c) One (1) CBI wood grinder, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;
- (d) One (1) "A" material transporter and screen, identified as A Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;
- (e) One (1) CBI wood grinder with screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding of "recently live" wood outdoors on VIM property, and controlling emissions of

fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;

- (f) One (1) Haybuster wood grinder with screen separator, identified as Haybuster, constructed in 2004, with a maximum capacity to grind twenty-five (25) tons of “recently live” wood per hour, grinding “recently live” wood outdoors on VIM property, and controlling emissions of particles through means described in the Fugitive Dust Control Plan, including associated storage piles;
- (g) One (1) CBI wood grinder diesel motor, constructed in 2000, with a maximum capacity of eight hundred (800) horsepower per hour (6.0 MMBtu/hr heat input), exhausting to Collector 1X when grinding indoors and exhausting to a mobile engine exhaust when grinding outdoors; and
- (h) One (1) Haybuster wood grinder diesel motor, constructed in 2000, with a maximum capacity of three hundred twelve (312) horsepower per hour (2.2 MMBtu/hr heat input), and exhausting to a mobile engine exhaust when grinding outdoors.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is 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 CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit 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.

B.3 Enforceability [326 IAC 2-7-7]

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46204-2251

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(c) 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 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[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 (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) 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 contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.12 Emergency Provisions [326 IAC 2-7-16]

- (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.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, and the 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 Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office Telephone Number: 1-800-753-5519 or (219) 245-4870

Northern Regional Office Facsimile Number: (219) 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
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 2-7-5(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (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 2-7-4. 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(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46204-2251

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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.
- (2) If IDEM, OAQ, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 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 in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are

explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b)(1), (c), or (e) and makes 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 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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 Part 70 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 any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor 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.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within 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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 **Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]**
- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate 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. This condition is not federally enforceable.
- C.2 **Opacity [326 IAC 5-1]**
- 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:
- (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.3 **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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 **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.
- C.6 **Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**
- Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on July 17, 2000. The plan is included as Attachment A.
- C.7 **Operation of Equipment [326 IAC 2-7-6(6)]**
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 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(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46204-2251

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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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 Quality
100 North Senate Avenue, P. O. Box 6015
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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 source 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.11 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

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

Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial thirty (30) 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of the wind speed, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

-
- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
 - (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this

condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are 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.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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, OAQ that retesting in one-hundred and twenty (120) 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 documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:
Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports 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. 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 Quality
100 North Senate Avenue, P. O. Box 6015
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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Indoor Grinding and Screening of Wood

- (a) One (1) CBI wood grinder and screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 1X, including associated storage piles;
- (b) One (1) "B" and "C" material transporter and screen, identified as B, C Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 2X, including associated storage piles;
- (c) One (1) CBI wood grinder, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;
- (d) One (1) "A" material transporter and screen, identified as A Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PM and PM10 Limitation [326 IAC 2-2][40 CFR 52.51]

The PM and PM10 emissions from the following units shall be limited as indicated below:

Unit	PM Limitation (lb/hr)	PM10 Limitation (lb/hr)
CBI wood grinder and screen separator - 1X	10.99	10.99
"B" and "C" material transporter and screen - 2X	2.09	2.09
CBI wood grinder and "A" material transporter and screen - 3X	9.11	9.11

These emission limitations, in conjunction with the PM and PM10 emissions from the CBI wood grinder diesel motor and the Haybuster wood grinder diesel motor, shall effectively limit the PM and PM10 emissions from the source to less than two hundred fifty (250) tons per year. Fugitive emissions are not counted toward the two hundred fifty (250) ton per year source wide limit because this operation is not one of the 28 listed source categories under 326 IAC 2-2 and there is no applicable New Source Performance Standards that were in effect on August 7, 1980. These limits render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.2 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to CP039-12174-00538, issued on August 21, 2000, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the listed facilities shall be limited as follows when operating at the listed process weight rates:

Unit	Process Weight Rate (ton/hr)	Particulate Emission Limit (lb/hr)
75 ton per hour CBI wood grinder & screen separator - indoor	75	48.43
"B" and "C" material transporter & screen	75	48.43
25 ton per hour CBI wood grinder & transport screen	25	35.43

These limits were calculated using the following equations:

Interpolation of the data for the process weight rate up to thirty (30) tons per hour shall be accomplished by use of the equation:

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

Or depending on process weight rate:

Interpolation and extrapolation of the data for the process weight rate in excess of thirty (30) tons per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.4 Particulate Emissions

Pursuant to CP039-12174-000538, issued on August 21, 2000, and in order to comply with Conditions D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from the listed units at all times that the listed units are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

- (a) Once per shift visible emission notations of the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen stack exhausts 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.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen processes at least once per shift when the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse Inspections

An inspection shall be performed during the last month of each calendar quarter of all bags controlling the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen operations. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business 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) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (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).

D.1.9 Storage Piles

Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, the Permittee shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of once per shift visible emission notations of the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen stack exhausts.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the total pressure drop across the baghouses.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain records of the visual inspections of outdoor ground wood storage piles. These records shall be maintained for a minimum period of twenty-four (24) months and made available upon request of the Office of Air Quality.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Outdoor Grinding and Screening of "Recently Live" Wood

- (e) One (1) CBI wood grinder with screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding of "recently live" wood outdoors on VIM property, and controlling emissions of fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;
- (f) One (1) Haybuster wood grinder with screen separator, identified as Haybuster, constructed in 2004, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding "recently live" wood outdoors on VIM property, and controlling emissions of particles through means described in the Fugitive Dust Control Plan, including associated storage piles;

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to CP039-12174-00538, issued on August 21, 2000, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the listed facilities shall be limited as follows when operating at the listed process weight rates:

Unit	Process Weight Rate (ton/hr)	Particulate Emission Limit (lb/hr)
CBI wood grinder & screen separator - outdoor	25	35.43
Haybuster wood grinder	25	35.43

These limits were calculated using the following equation:

Interpolation of the data for the process weight rate up to thirty (30) tons 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.2.2 Fugitive Dust Emissions [326 IAC 6-4-1] [326 IAC 6-4-2]

Pursuant to CP039-12174-00538, issued August 21, 2000, and 326 IAC 6-4-2 (Fugitive Dust Emissions Limitations), emissions of particulate from outdoor "recently live" wood grinding shall be in violation of 326 IAC 6-4 if any of the following criteria are violated:

- (a) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100 (R - U)}{U}$$

where P = percentage increase
R = number of particles of fugitive dust measured at the downward receptor site
U = number of particles of fugitive dust measured upwind of background site

- (b) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (a) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) * P$$

where P_R = allowable percentage increase in dust concentration above backgrounds

N = fraction of fugitive dust that is respirable dust

P = no value greater than sixty-seven percent (67%)

- (c) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (d) If the fugitive dust is visible crossing the boundary or property line or a source. This subdivision may be refuted by factual data expressed in subdivision (a), (b), or (c) of this section.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.2.4 Fugitive Dust Control [326 IAC 6-5]

The source shall control emissions of fugitive particulate from the outdoor grinding and screening of "recently live" wood through:

- (a) Spraying water, as necessary, during the grinding and screening operation to prevent visible fugitive dust.
- (b) Grinding screening only "recently live" wood outdoors.
- (c) Grinding and screening "recently live" wood during periods when wind speeds, at the VIM property, measure less than ten (10) miles per hour. Wind speed shall be measured hourly while grinding and screening outdoors. In the event of the wind speeds exceeding ten (10) miles per hour during grinding and screening outdoors, operation shall stop until wind speeds slow down to less than ten (10) miles per hour.
- (d) Grinding and screening outdoors a maximum of eight (8) hours in any day.

A copy of the Fugitive Dust Control Plan can be found as Attachment A.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Pursuant to CP039-12174-00538, issued August 21, 2000, and to ensure compliance with Condition D.2.2, the source shall conduct continuous visual observations, by a trained employee to assure that no visible particulate is crossing the VIM property line at any time while the processes are in operation.
- (b) 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.

D.2.6 Monitoring

Pursuant to CP039-12174-00538, issued August 21, 2000, and in order to comply with Condition D.2.4, the source shall measure the wind speed prior to beginning outdoor grinding and shall continue to measure wind speed hourly while grinding outdoors.

D.2.7 Storage Piles

Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, the Permittee shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of the visible observations of fugitive particulate emissions and the hours of operation of the CBI and Haybuster grinders.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the wind speed and the hours of observation of the CBI and Haybuster grinders.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the visual inspections of outdoor ground wood storage piles. These records shall be maintained for a minimum period of twenty-four (24) months and made available upon request of the Office of Air Quality.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Internal Combustion Facilities

- (g) One (1) CBI wood grinder diesel motor, constructed in 2000, with a maximum capacity of eight hundred (800) horsepower per hour (6.0 MMBtu/hr heat input), exhausting to Collector 1X when grinding indoors and exhausting to a mobile engine exhaust when grinding outdoors; and
- (h) One (1) Haybuster wood grinder diesel motor, constructed in 2000, with a maximum capacity of three hundred twelve (312) horsepower per hour (2.2 MMBtu/hr heat input), and exhausting to a mobile engine exhaust when grinding outdoors.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Nitrous Oxides (NO_x)

Pursuant to CP039-12174-00538, issued August 21, 2000, the total input of diesel fuel to the two (2) grinders' (CBI and Haybuster) diesel motors shall be limited to the following (based on an assumed diesel heating value of 137,000 Btu per gallon):

- (a) CBI grinder diesel motors: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (b) Haybuster grinder diesel motors: 15,456 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

This is equivalent to NO_x emissions of less than forty (40) tons per year.

D.3.2 Sulfur Dioxide (SO₂) [326 IAC 7-1]

Pursuant to CP039-12174-00538, issued August 21, 2000, the sulfur content of the diesel fuel shall not exceed 0.5%. This limit renders the requirements of 326 IAC 7-1 (Sulfur Dioxide Emission Limitations) not applicable as this limit will ensure that the sulfur dioxide emissions from the CBI grinder and Haybuster grinder diesel motors do not individually have the potential to emit greater than twenty-five (25) tons per year of sulfur dioxide.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.3.4 Fuel Limitations

Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each month based on the fuel consumption for each grinder during the most recent month.

D.3.5 Sulfur Content

Compliance with Condition D.3.2 shall be determined utilizing one of the following options:

Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur content of the diesel fuel does not exceed 0.5% by:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

- (a) Once per shift visible emission notations of CBI and Haybuster grinder diesel motor stack exhaust shall be performed during normal daylight operations when firing diesel fuel. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records of the CBI and Haybuster grinder diesel motor monthly fuel usage.
- (b) To document compliance with Condition D.3.2, the Permittee shall maintain records of the sulfur content of the fuel oil used by the CBI and Haybuster grinder diesel motors.
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain records of once per shift visible emission notations of the CBI and Haybuster diesel motor stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address 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 quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: VIM Recycling, Inc.
Source Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Mailing Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Part 70 Permit No.: 039-15593-00538

**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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: VIM Recycling, Inc.
Source Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Mailing Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Part 70 Permit No.: 039-15593-00538

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
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:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY Compliance Data Section

Part 70 Quarterly Report

Source Name: VIM Recycling, Inc.
 Source Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
 Mailing Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
 Part 70 Permit No.: 039-15593-00538
 Facility: CBI and Haybuster wood grinder diesel motors
 Parameter: Fuel Usage
 Limit: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month for the CBI grinder.
 15,456 gallons per twelve (12) consecutive period with compliance determined at the end of each month for the Olathe grinder.

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	CBI	Haybuster	CBI	Haybuster	CBI	Haybuster
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: VIM Recycling, Inc.
 Source Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
 Mailing Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
 Part 70 Permit No.: 039-15593-00538

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".	
<input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attachment A

Fugitive Dust Control Plan Approved July 17, 2000

VIM Recycling, Inc.
29861 Old U.S. Highway 33
Elkhart, Indiana 46516

Section 1 - Introduction

The following control plan, when implemented, is designed to reduce uncontrolled fugitive dust generated from paved roadways and areas, unpaved roadways and areas, aggregated storage piles, and grinding and screening of wood outdoors.

The plan shall be implemented on a year-round basis until such a time as another plan is approved or ordered by the Indiana Department of Air Quality.

The person on site who is responsible for implementing the plan is:

VIM Recycling, Inc.
Kenneth R. Will
P.O. Box 808
Goshen, Indiana 46527-0808

Section 2 - Outdoor Grinding and Screening

The following shall control fugitive particulate matter emissions from the outdoor grinding and screening of "recently live"¹ wood:

- (a) Spraying water, as necessary, during the grinding and screening operation to prevent visible fugitive dust.
- (b) Grinding and screening only "recently live" wood outdoors.
- (c) Grinding and screening "recently live" wood during periods when wind speeds, at the VIM Recycling property, measure less than ten (10) miles per hour. Wind speed shall be measured hourly when grinding and screening outdoors. In the event of the wind speeds exceeding ten (10) miles per hour during grinding and screening outdoors, operation shall stop until wind speeds slow down to less than ten (10) miles per hour.
- (d) Grinding and screening outdoors a maximum of eight (8) hours in any day.

Section 3 - Paved Roads and Areas

¹ "recently live" wood - wood, including trunk, branches, and leaves, that has not been processed or cut into dimensional lumber, and has been stored no longer than sixty (60) days onsite.

Dust from paved roads and areas will be controlled by sweeping and shall be performed every 14 days or more often to prevent visible fugitive dust from crossing the VIM property line, as determined by a trained employee², from these areas. Records of sweeping will be required.

Exceptions - Cleaning of paved roads and areas may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The road segments or areas is closed or abandoned. Abandoned roads or areas will be barricaded to prevent vehicle access.
- (c) It is raining at the time of the scheduled cleaning.

Section 4 - Unpaved Roads and Areas

Unpaved roads and areas at the facility shall be sprayed with water, as necessary, for dust control to prevent fugitive dust from crossing the VIM property line. A trained employee shall determine visual particulate emissions, visual observation shall be made twice daily, and records shall be kept of these observations in the journal. Records of spraying water onto unpaved roads and areas shall also be required.

Exceptions - Treating of unpaved roads and areas may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The road segments or areas are frozen or covered by ice, snow, or standing water.
- (c) The road segments or areas is closed or abandoned. Abandoned roads or areas will be barricaded to prevent vehicles from traveling on the roads or areas.

Section 5 - Open Aggregate Storage Piles

Open aggregate piles will consist of only landscape mulch and scrap wood. the sue of water as a dust suppressant shall be the primary means of dust control. The water shall be applied, as necessary, to the aggregate storage piles to prevent emission of fugitive particulate matter from crossing the VIM property line. A trained employee shall determine visual particulate emission, visual observation shall be made twice daily, and a record shall be kept of these observations in the journal. Records of spraying water onto piles shall also be required.

Exceptions - Treating of aggregate storage piles may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The storage piles are frozen or covered by ice or snow.

Section 6 - Material Handling

Front-end loaders will be used to maintain the aggregate storage piles. Fugitive particulate matter from loading and unloading of outdoor aggregate storage piles shall be controlled by the following: spraying

² trained employee - an employee that has worked at the source at least one (1) month and has been trained in the appearance and characteristics of normal visible dust emissions for that specific process

with water, as necessary, when determined by a trained employee, and reduction of the free fall distance between the front-end loader and truck.

Fugitive particulate matter control from the loading and unloading of indoor storage piles shall be accomplished by the following: trucks shall be loaded with materials stored in the VIM building only within the building.

Section 7 - Monitoring and Record Keeping

Records shall be kept in a journal, which will be updated daily by the responsible official. The journals shall be kept in storage for a minimum of three (3) years and shall be available for inspection or copying upon reasonable prior notice. The following information will be required in the journal with each entry:

Grinding and Screening Outdoors:

- (a) Name of trained employee making observations
- (b) Wind speed prior to startup of grinding and screening outdoors
- (c) Hourly readings of wind speed while grinding and screening outdoors
- (d) Hours of operation for grinding and screening in a day

Paved Roads and Areas

- (a) Name of trained employee making observations
- (b) Record of the dates when areas are swept

Unpaved Roads and Areas and Aggregate Storage Piles

- (a) Name of trained employee making observations
- (b) Date and time the observations were made
- (c) Date and time when water is applied

Section 8 - Compliance Schedule

This plan shall be fully implemented when construction is complete. Until that time, the plan shall be implemented within portions of the site where construction is considered complete. Where construction is incomplete, appropriate control measures shall be implemented, but cannot be comprehensively addressed. These activities shall be included in the journal.

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the
Technical Support Document (TSD)
for a Minor Permit Modification to a Part 70 Operating Permit**

Source Background and Description

Source Name:	VIM Recycling, Inc.
Source Location:	29861 Old U.S. Highway 33, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	2499
Operation Permit No.:	T039-15593-00538
Operation Permit Issuance Date:	January 24, 2003
Minor Permit Modification No.:	039-19895-00538
Permit Reviewer:	ERG/SD

On February 3, 2005 the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that VIM Recycling, Inc. had applied for a minor permit modification to an existing stationary operation that manufactures landscape mulch, animal bedding, and wood for fuel using recycled wood as raw material.

Background

A Part 70 permit (T039-15593-00538) was issued to this source on January 24, 2003. On October 25, 2004, the Permittee submitted an application informing IDEM, OAQ of the construction of one (1) new emission unit identified as Haybuster wood grinder which replaced the existing Olathe wood grinder. The notice also stated that IDEM, OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. A summary of public comments follows:

Comment on March 3, 2005 from Neil Herman, Elkhart County Councilman:

Councilman Herman met with residents on November 20, 2004 to hear their concerns regarding VIM Recycling. It was Councilman Herman's opinion that residents of the area had valid reasons for concern and needed answers that only IDEM and the county could address. He requested that IDEM hold a public hearing.

Comment on March 3, 2005 from Tom & Regina Leveque, 29799 Cleveland Ave, Elkhart, IN 46516:

Mr. and Mrs. Leveque expressed concerns about the huge piles of trash at 29861 U.S. Highway 33, Elkhart, IN., the smell, and the yellow dust on their property. They said VIM Recycling Inc. in Elkhart was lowering property values and requested a public hearing to discuss air pollution coming from the VIM plant.

Comment on March 3, 2005 from Archie & Mary Underwood, 29631 Cardinal Ave, Elkhart, IN 46516:

Mr. and Mrs. Underwood expressed health concerns as well as concerns about the smell coming from the VIM Recycling plant. They felt it would be hard for them to sell their house and requested a public hearing.

Comment on March 3, 2005 from Michael & Bonnie Fitch, 56861 C.R. 1 South, Elkhart, IN 46516:

Mr. and Mrs. Fitch expressed environmental and safety concerns due to VIM Recycling's operations. They stated the plant manager had promised that all wood grinding would be done inside, but in 2001 VIM was granted a permit to do extensive outside grinding of wood and as a result vehicles and residences in the neighborhood were perpetually covered with up to a quarter inch of wood dust. Residents with health problems have been among the many who have signed a petition against VIM Recycling. Mr. and Mrs. Fitch also thought the grinding might be in violation of the county noise ordinance. They stated the piles of raw material were not only unsightly, but were also a safety hazard. On March 28, 2003, some of those piles caught fire and on July 28, 2004, the dust collector caught fire. They wanted a public meeting to hear resident concerns and have those concerns of safety and health forwarded to the appropriate parties.

Comment on March 2, 2005 from Joyce Bellows, 56234 46th Street, Elkhart, IN 46516:

Ms. Bellows requested a public hearing be held for all residents in the area bordering the commercial zone on Highway U.S. 33.

Comment on February 28, 2005 from Debra Brown, 56791 C.R. 1, Elkhart, IN 46516:

Ms. Brown expressed opposition to the way VIM Recycling ran their business and asked for a public meeting.

Comment from Annette and Dennis L. Freel, 29919 Arizona Ave, Elkhart, IN 46516:

Mr. and Mrs. Freel requested a public hearing in regards to the VIM Recycling facility and the Minor Permit Modification 039-19895-00538. They also asked to be on the IDEM mailing list to receive notices of future actions related to this permit and other actions taking place in the area.

Response to public comments:

Vim Recycling, Inc. is an existing stationary operation that manufactures landscape mulch, animal bedding, and wood for fuel using recycled wood as raw material. A Part 70 permit (T039-15593-00538) was issued to this source on January 24, 2003.

On October 25, 2004, the Permittee submitted an application to IDEM, OAQ requesting approval to construct a Haybuster wood grinder, which replaced the existing Olathe wood grinder, and to delete Conditions D.1.3 and D.2.3 (Storage Piles) which were from the Agreed Orders 2000-9603-A and 2000-9849-A, signed August 23, 2001. IDEM, OAQ granted the approval to the Permittee on January 5, 2005 via Minor Source Modification No.: 039-20302-00538.

The summary of the modifications are as follows:

- (a) The Haybuster wood grinder is used in conjunction with the screen separator at a maximum grinding capacity of twenty-five (25) tons of "recently live" wood per hour and operated by an existing 312 horsepower diesel engine. The particulate emissions from the Haybuster wood grinder are controlled as described in the existing Fugitive Dust Control Plan approved by IDEM, OAQ on July 17, 2000.
- (b) The Agreed Orders 2000-9603-A and 2000-9849-A were issued to VIM Recycling at both the Elkhart and Goshen plants. However, according to these Agreed Orders, the specific requirements included in Conditions D.1.3 and D.2.3 in T039-15593-00538 applied to the storage piles at Goshen plant only. Therefore, Conditions D.1.3 and D.2.3 were removed from the Part 70 permit no.: T039-15593-00538 since this permit applies to the VIM Recycling plant at Elkhart. The permit requires the proper control of particulate emissions through means described in the Fugitive Dust Control Plan, including associated storage piles and provisions of 326 IAC 6-4-2 (Fugitive Dust Emissions Limitations). Conditions D.2.2 and D.2.4 of the permit [326 IAC 6-4-1, 326 IAC 6-4-2, and 326 IAC 6-5] includes a mechanism for establishing a violation in case of emissions exceedances and details how to control fugitive particulate emissions from outdoor grinding and screening processes. If severe problems arise in the future, IDEM, OAQ

can reevaluate the Fugitive Dust Control Plan. IDEM, OAQ lacks specific authority to regulate odor.

All comments are considered by IDEM when making 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 specific legal authority to regulate zoning, odor or noise. For such issues, contacting your local government officials who have jurisdiction on such matters may prove beneficial.

In response to all of these public complaints, IDEM's Northern Regional Office conducted a multi-media inspection on August 2, 2005 and August 10, 2005. As a result of these inspections, the following alleged violations have been referred to IDEM's Office of Enforcement:

1. Condition D.1.7 (Baghouse Inspections): The Permittee failed to perform the quarterly baghouse inspections.
2. Condition D.1.10 (Record Keeping): The Permittee failed to maintain sufficient records of the visible emission notations, parametric monitoring, and quarterly baghouse inspections as required by Conditions D.1.5, D.1.6 and D.1.7, respectively.
3. Condition D.2.4 (Fugitive Dust Control): The Permittee was observed grinding outdoors when the wind was 10 mph or greater.
4. Condition D.2.8 (Record Keeping): The Permittee failed to maintain sufficient records of the visible emission notations, hours of operation, and wind measurements required by Conditions D.2.5 (Visible Emission Notations) and D.2.6 (Monitoring).
5. Condition D.3.6 (Visible Emission Notations): The Permittee failed to perform visible emission notations of the diesel motor stack exhaust.
6. Condition D.3.7 (Record Keeping): The Permittee failed to record the results of the visible emission notations as required by Condition D.3.6.
7. Fugitive Dust Control Plan (FDCP): The Permittee was observed grinding outdoors when the wind was 10 mph or greater. (This is a duplicate allegation to that of Condition D.2.4(c).) The source also failed to maintain sufficient records of sweeping paved roads, spraying water onto unpaved roads and aggregate storage piles, visible particulate emissions from unpaved roads and aggregate storage piles, wind speed measurements during outdoor grinding and screening, and hours of operation of outdoor grinding and screening.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. IDEM's mailing address has been corrected throughout the permit:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, ~~P. O. Box 6015~~
Indianapolis, Indiana 46204-**2215** ~~6-6015~~

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and a Part 70 Minor Permit Modification

Source Background and Description

Source Name:	VIM Recycling, Inc.
Source Location:	29861 Old U.S. Highway 33, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	2499
Operation Permit No.:	T039-15593-00538
Operation Permit Issuance Date:	January 24, 2003
Minor Source Modification No.:	039-20302-00538
Minor Permit Modification No.:	039-19895-00538
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a modification application from VIM Recycling, Inc. relating to the construction and operation of the following emission units and pollution control devices:

- (f) One (1) Haybuster wood grinder with screen separator, identified as Haybuster, constructed in 2004, with a maximum capacity to grind twenty-five (25) tons of “recently live” wood per hour, grinding “recently live” wood outdoors on VIM property, and controlling emissions of particles through means described in the Fugitive Dust Control Plan, including associated storage piles.

History

Vim Recycling, Inc. is an existing stationary operation that manufactures landscape mulch, animal bedding, and wood for fuel using recycled wood as raw material. A Part 70 permit (T039-15593-00538) was issued to this source on January 24, 2003.

On October 25, 2004, the Permittee submitted an application informing IDEM, OAQ of the construction of one (1) new emission unit identified as Haybuster wood grinder which replaced the existing Olathe wood grinder. The Haybuster wood grinder will be used in conjunction with the screen separator at a maximum grinding capacity of twenty-five (25) tons of “recently live” wood per hour and shall be operated by an existing 312 horsepower diesel engine. The particulate emissions from the Haybuster wood grinder will continue to be controlled as described in the existing Fugitive Dust Control Plan approved by IDEM, OAQ on July 17, 2000. The Permittee also requested to delete Conditions D.1.3 and D.2.3 (Storage Piles) which were from the Agreed Orders 2000-9603-A and 2000-9849-A, signed August 23, 2001. The Agreed Orders 2000-9603-A and 2000-9849-A were issued to VIM recycling at both the Elkhart and Goshen plants. According to these agreed orders, the specific requirements included in Conditions D.1.3 and D.2.3 in T039-15593-00538 applied to the storage piles at Goshen plant only. Therefore, Conditions D.1.3 and D.2.3 have been removed from this permit since this is a Part 70 permit for VIM Recycling at Elkhart. IDEM, OAQ has also revised Condition C.19 to be consistent with the requirements in the recently revised 326 IAC 2-6 (Emission Reporting).

Enforcement Issue

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing the matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and the Part 70 Minor Permit Modification 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.

An application for the purposes of this review was received on October 25, 2004. Additional information was received on November 22, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (page 1 of 1).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	38.3
PM10	38.3
SO ₂	0.00
VOC	0.00
CO	0.00
NO _x	0.00

There are no HAP emissions associated with the operation of Haybuster grinder.

Justification for Modification

This modification is being performed through a Part 70 Minor Source Modification pursuant to 326 IAC 2-7-10.5(d)(8), because although the modification has a potential to emit of PM and PM10 greater than 25 tons per year, this modification consists of adding an emission unit for the same type that is already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing unit. The Part 70 Operating Permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(b) because this modification meets all the criteria in 326 IAC 2-7-12(b)(1).

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO _x	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Elkhart County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not in one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD and NSR Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	103
PM10	111
SO ₂	16.1
VOC	6.10
CO	31.5
NO _x	39.9

- (a) This existing source is a minor stationary source under nonattainment new source review because no nonattainment regulated pollutants (NO_x and VOC) are emitted at a rate of one hundred (100) tons per year or more, and it is not in one (1) of the twenty-eight (28) listed source categories.
- (b) This existing source is a minor stationary source under PSD review because no attainment regulated pollutant is emitted at a rate of two hundred and fifty (250) tons per year or more, and it is not in one (1) of the twenty-eight (28) listed source categories.

- (c) These emissions are based on the potential to emit for the source as given in T039-15593-00538, issued January 24, 2003.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Emission Units	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
75 ton per hour CBI wood grinder and screen separator (Collector 1X)	Less than 48.15	Less than 48.15	0.0	0.0	0.0	0.0	0.0
"B" and "C" material transporter and screen (Collector 2X)	Less than 9.15	Less than 9.15	0.0	0.0	0.0	0.0	0.0
25 ton per hour CBI wood grinder and "A" material transporter and screen (Collector 3X)	Less than 39.89	Less than 39.89	0.0	0.0	0.0	0.0	0.0
CBI wood grinder and Olathe wood grinder diesel motors	5.62	4.14	16.06	6.10	31.5	Less than 40 ^a	Neg.
Haybuster grinder	38.3	38.3	0.0	0.0	0.0	0.0	0.0
Storage piles (Fugitive Emissions) ^b	15.9	15.9	0.0	0.0	0.0	0.0	0.0
Storage piles Handling (Fugitive Emissions) ^b	0.01	0.005	0.0	0.0	0.0	0.0	0.0
Unpaved Roads (Fugitive Emissions) ^b	110	33.0	0.0	0.0	0.0	0.0	0.0
Total Emissions	228.5 141	150.3 140	16.06	6.10	31.5	Less than 40	Neg.

Note: All emissions shown are at maximum capacity unless otherwise footnoted.

^a Pursuant to T039-15593-00538, issued January 24, 2003, the NOx emissions are limited to less than 40 tons per year such that additional NOx emitting equipment can be added to the source and the PSD minor status of the source can be maintained. Any additional equipment shall be approved by IDEM, OAQ.

^b Fugitive emissions are not counted towards PSD applicability because this source is not in one (1) of the twenty-eight (28) source categories.

This modification to an existing minor stationary source is not major because the emissions from the modification is zero for VOC and NOx under the Nonattainment New Source Review; and less than PSD significant levels for all other criteria pollutants. Therefore, pursuant to 326 IAC 2-1.1-5 and 326 IAC 2-2, the Nonattainment New Source Review and PSD requirements do not apply.

Federal Rule Applicability

- (a) This minor source modification does not involve a pollutant-specific emissions unit:
- (1) With the potential to emit before controls equal to or greater than one hundred (100) tons per year, and

- (2) That is subject to an emission limit and has a control device that is necessary to meet that limit.
Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Entire Source

326 IAC 2-2 Prevention of Significant Deterioration (PSD)

Title V No.: 039-15593-00538, issued January 24, 2003 identifies the source as a minor source of particulate and NOx under PSD. As of June 15, 2004, Elkhart County has been designated as nonattainment under the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to 326 IAC 2-1.1-5 (Nonattainment NSR).

On October 25, 2004 the Permittee submitted an application informing IDEM, OAQ of the construction of a Haybuster wood grinder, which will replace the Olathe wood grinder, and function in the same capacity as the latter. This unit operates outdoors with no stack, and is subject to the Fugitive Dust Control Plan approved by IDEM, OAQ on July 17, 2000. The potential to emit of PM and PM10 from this modification is equal to 38.3 tons per year and is counted towards the total source wide emissions. After this modification, the source remains a minor source under 326 IAC 2-2 (PSD).

The potential to emit of VOC, SO₂ and CO remain less than 250 tons per year.

326 IAC 2-1.1-5 (Nonattainment New Source Review)

This source is located in Elkhart County. As of June 15, 2004, Elkhart County has been designated as nonattainment under the 8-hour ozone standard. This source is a minor source because the potential to emit of NOx and VOC are less than one hundred (100) tons per year.

This modification to an existing minor source is not major for VOC or NOx because there are no VOC or NOx emissions from the new wood grinder. Therefore, this modification is not subject to the provisions of 326 IAC 2-1.1-5 (Nonattainment New Source Review).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This modification is not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) because the modification does not result in HAP emissions.

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 for sources 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 non-overlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Haybuster Wood Grinder

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from Haybuster wood grinder shall not exceed 35.4 pounds per hour when operating at a process weight rate of 25 tons per hour.

This limit was calculated using the following equation:

Interpolation of the data for the process weight rate up to thirty (30) tons per hour shall be accomplished by use of the equation:

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

The fugitive dust control plan shall be implemented at all times the Haybuster wood grinder is in operation, in order to comply with this limit.

326 IAC 6-4-2 (Fugitive Dust Emissions Limitations)

Pursuant to T039-15593-00538, issued on January 24, 2003, and 326 IAC 6-4-2 (Fugitive Dust Emissions Limitations), particulate emissions from outdoor "recently live" wood grinding shall be in violation of 326 IAC 6-4 if any of the following criteria are violated:

- (a) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100(R - U)}{U}$$

where P = percentage increase
R = number of particles of fugitive dust measured at the downward receptor site
U = number of particles of fugitive dust measured upwind of background site

- (b) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (a) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) * P$$

where P_R = allowable percentage increase in dust concentration above backgrounds
N = fraction of fugitive dust that is respirable dust
P = no value greater than sixty-seven percent (67%)

- (c) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (d) If the fugitive dust is visible crossing the boundary or property line or a source. This subdivision may be refuted by factual data expressed in subdivision (a), (b), or (c) of this section.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to T039-15593-00538, issued on January 24, 2003 and 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), The Permittee shall control fugitive emissions according

to the Fugitive Dust Control Plan submitted by the source and approved by IDEM, OAQ on July 17, 2000.

Agreed Orders 2000-9603-A and 2000-9849-A

Pursuant to T039-15593-00538, issued on January 24, 2003 and Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, outdoor storage piles associated with the Haybuster wood grinder at the source shall continue to comply with Conditions D.1.10 (now D.1.9) and D.2.8 (now D.2.7):

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as described in Section D.1 and D.2 of the Title V permit No.: 039-15593-00538, issued January 24, 2003.

Proposed Changes

Language with a line through it has been deleted and language in bold has been added. The Table of Contents has been changed as necessary.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary operation that manufactures landscape mulch, animal bedding, and wood for fuel, using recycled wood as raw material.

Responsible Official:	President
Source Address:	29861 Old U.S. Highway 33, Elkhart, Indiana 46516
Mailing Address:	29861 Old U.S. Highway 33, Elkhart, Indiana 46516
General Source Phone Number:	(574) 642-3677
SIC Code:	2499
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8-hour standards Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, under Nonattainment NSR Rules; Minor Source, under Section 112 of the Clean Air Act; Not 1 of the 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

-
- (f) One (1) ~~One~~ **Haybuster** wood grinder with screen separator, identified as ~~One~~ **Haybuster**, constructed in 2000~~04~~, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding "recently live" wood outdoors on VIM property, and controlling emissions of fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;

-
- (h) One (1) ~~One~~ **Haybuster** wood grinder diesel motor, constructed in 2000, with a maximum capacity of three hundred twelve (312) horsepower per hour (2.2 MMBtu/hr heat input), and exhausting to a mobile engine exhaust when grinding outdoors.

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

-
- ~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~
- ~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
- ~~(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.~~
- ~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~
- ~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~
- ~~The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(c) The annual emission statement 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.~~
- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);**
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.**

The statement must be submitted to:

**Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204**

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.1.1 PM and PM10 Limitation [326 IAC 2-2][40 CFR 52.51]

.....

These emission limitations, in conjunction with the PM and PM10 emissions from the CBI wood grinder diesel motor and the ~~the~~ **Haybuster** wood grinder diesel motor, shall effectively limit the PM and PM10 emissions from the source to less than two hundred fifty (250) tons per year. Fugitive emissions are not counted toward the two hundred fifty (250) ton per year source wide limit because this operation is not one of the 28 listed source categories under 326 IAC 2-2 and there is no applicable New Source Performance Standards that were in effect on August 7, 1980. These limits render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Storage Piles

~~(a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, outdoor storage piles at the source shall:~~

~~(1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line; and~~

~~(2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building.~~

~~(b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors. Moving or loading of material is allowed.~~

D.1.34 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.1.45 Particulate Emissions

D.1.56 Visible Emissions Notations

D.1.67 Parametric Monitoring

D.1.78 Baghouse Inspections

D.1.89 Broken or Failed Bag Detection

D.1.910 Storage Piles

D.1.1014 Record Keeping Requirements

- (a) To document compliance with Condition D.1.56, the Permittee shall maintain records of once per shift visible emission notations of the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen stack exhausts.
- (b) To document compliance with Condition D.1.67, the Permittee shall maintain records of the total pressure drop across the baghouses.
- (c) To document compliance with Condition D.1.78, the Permittee shall maintain records of the results of the inspections required under Condition D.1.78.
- (d) To document compliance with Condition D.1.940, the Permittee shall maintain records of the visual inspections of outdoor ground wood storage piles. These records shall be maintained for a minimum period of twenty-four (24) months and made available upon request of the Office of Air Quality.

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SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Outdoor Grinding and Screening of "Recently Live" Wood

.....

- (f) One (1) ~~Olath~~**Haybuster** wood grinder with screen separator, identified as ~~Olath~~**Haybuster**, constructed in 2009, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding "recently live" wood outdoors on VIM property, and controlling emissions of fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;

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

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

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Unit	Process Weight Rate (ton/hr)	Particulate Emission Limit (lb/hr)
CBI wood grinder & screen separator - outdoor	25	35.43
Olath Haybuster wood grinder	25	35.43

D.2.3 Storage Piles

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, outdoor storage piles at the source shall:
 - (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line; and
 - (2) Not be located south of the imaginary line running east to west across the northern face of the facilities northern-most building.
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors. Moving or loading of material is allowed.

D.2.34 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.2.45 Fugitive Dust Control [326 IAC 6-5]

D.2.56 Visible Emissions Notations

D.2.67 Monitoring

Pursuant to CP039-12174-00538, issued August 21, 2000, and in order to comply with Condition D.2.45, the source shall measure the wind speed prior to beginning outdoor grinding and shall continue to measure wind speed hourly while grinding outdoors.

D.2.78 Storage Piles

D.2.89 Record Keeping Requirements

- (a) To document compliance with Condition D.2.56, the Permittee shall maintain records of the visible observations of fugitive particulate emissions and the hours of operation of the CBI and ~~Theta~~**theHaybuster** grinders.
- (b) To document compliance with Condition D.2.67, the Permittee shall maintain records of the wind speed and the hours of observation of the CBI and ~~Theta~~**theHaybuster** grinders.
- (c) To document compliance with Condition D.2.78, the Permittee shall maintain records of the visual inspections of outdoor ground wood storage piles. These records shall be maintained for a minimum period of twenty-four (24) months and made available upon request of the Office of Air Quality.

....

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Internal Combustion Facilities

....

- (h) One (1) ~~Theta~~**theHaybuster** wood grinder diesel motor, constructed in 2000, with a maximum capacity of three hundred twelve (312) horsepower per hour (2.2 MMBtu/hr heat input), and exhausting to a mobile engine exhaust when grinding outdoors.

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

D.3.1 Nitrous Oxides (NOx)

Pursuant to CP039-12174-00538, issued August 21, 2000, the total input of diesel fuel to the two (2) grinders' (CBI and ~~Theta~~**theHaybuster**) diesel motors shall be limited to the following (based on an assumed diesel heating value of 137,000 Btu per gallon):

- (a) CBI grinder diesel motors: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (b) ~~Theta~~**theHaybuster** grinder diesel motors: 15,456 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

This is equivalent to NOx emissions of less than forty (40) tons per year.

D.3.2 Sulfur Dioxide (SO₂) [326 IAC 7-1]

Pursuant to CP039-12174-00538, issued August 21, 2000, the sulfur content of the diesel fuel shall not exceed 0.5%. This limit renders the requirements of 326 IAC 7-1 (Sulfur Dioxide Emission Limitations) not applicable as this limit will ensure that the sulfur dioxide emissions from the CBI grinder and ~~Olathe~~**Haybuster** grinder diesel motors do not individually have the potential to emit greater than twenty-five (25) tons per year of sulfur dioxide.

D.3.6 Visible Emissions Notations

(a) Once per shift visible emission notations of CBI and ~~Olathe~~**Haybuster** grinder diesel motor stack exhaust shall be performed during normal daylight operations when firing diesel fuel. A trained employee shall record whether emissions are normal or abnormal.

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records of the CBI and ~~Olathe~~**Haybuster** grinder diesel motor monthly fuel usage.
- (b) To document compliance with Condition D.3.2, the Permittee shall maintain records of the sulfur content of the fuel oil used by the CBI and ~~Olathe~~**Haybuster** grinder diesel motors.
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain records of once per shift visible emission notations of the CBI and ~~Olathe~~**Haybuster** diesel motor stack exhaust.

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section
 Part 70 Quarterly Report**

Source Name: VIM Recycling, Inc.
 Source Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
 Mailing Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
 Part 70 Permit No.: 039-15593-00538
 Facility: CBI and ~~Olathe~~**Haybuster** wood grinder diesel motors
 Parameter: Fuel Usage
 Limit: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month for the CBI grinder.
 15,456 gallons per twelve (12) consecutive period with compliance determined at the end of each month for the Olathe grinder.

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
Month 1	CBI	Olathe Haybuster	CBI	Olathe Haybuster	CBI	Olathe Haybuster

Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the proposed Part 70 Minor Source Modification No. 039-20302-00538, and the operation of this proposed modification shall be subject to the conditions of the proposed Part 70 Minor Permit Modification No. 039-19895-00538.