



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: January 31, 2005

RE: VIM Recycling, Inc. / 039-20302-00538

FROM: Paul Dubenetzky
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

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels
Governor

Thomas W. Easterly
Commissioner

January 31, 2005

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Indianapolis, Indiana 46204
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www.state.in.us/idem

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

Re: 039-20302
Minor Source Modification to:
Part 70 Permit No.: T039-15593-00538

Dear Mr. Will:

VIM Recycling, Inc. was issued Part 70 operating permit T039-15593-00538 on January 24, 2003 for a stationary operation that manufactures landscape mulch, animal bedding, and wood for fuel using recycled wood as raw material. An application to modify the source was received on October 25, 2004. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

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

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.



Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanober 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, Chief
Permits Branch
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 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality | Issuance Date: January 24, 2003 Expiration Date: January 24, 2008 |
| Minor Source Modification No.: 039-20302-00538 | Pages Affected: |
| Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: January 31, 2005 |

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 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 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

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.

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 NO_x under PSD. As of June 15, 2004, Elkhart County has been designated as nonattainment under the 8-hour ozone standard. Therefore, VOC and NO_x 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 NO_x and VOC are less than one hundred (100) tons per year.

This modification to an existing minor source is not major for VOC or NO_x because there are no VOC or NO_x 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) ~~Olath~~**Haybuster** wood grinder with screen separator, identified as ~~Olath~~**Haybuster**, constructed in 2000~~4~~, 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) ~~Olath~~**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.

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 ~~Olath~~**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.1.940 Storage Piles

D.1.1044 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.1.94, 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.2 FACILITY OPERATION CONDITIONS

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

.....

- (f) One (1) ~~at the~~ Haybuster wood grinder with screen separator, identified as ~~at the~~ Haybuster, constructed in 2000, 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]

.....

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

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 ~~the~~ **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) ~~the~~ **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 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.

....

**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 month 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 | Olathe Haybuster | CBI | Olathe Haybuster | CBI | Olathe 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.

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.

**Appendix A: Emissions Calculations
Woodworking**

Company Name: VIM Recycling, Inc.
Address: 29861 Old U.S. Highway 33, Elkhart, Indiana 46516
Permit Number: 039-20302-00538
Plt ID: 039-00538
Reviewer: ERG/SD
Date: December 2, 2004

| Emission Unit | Process | Max. Throughput Rate (ton/hour) | Emission Factor PM/PM10 (lb/ton)* | PTE PM/PM10 (tons/year) |
|---------------|------------------|---------------------------------|-----------------------------------|-------------------------|
| Haybuster | Log Sawing | 25.0 | 0.35 | 38.3 |
| | Sawdust Handling | 0.03 | 1.00 | 0.1 |
| Total | | | | 38.5 |

The existing Olathe grinder has been replaced with a new Haybuster grinder, a fugitive emission unit, that shall be controlled as per the Fugitive Dust Control Plan approved by IDEM, OAQ on July 17, 2000.

* Emission factors are from the 1985 version of AP-42 (Table 10.3-1, 10.3-2, and 10.4-1).

METHODOLOGY

PTE of PM/PM10 (tons/year) = Maximum throughput rate (tons/hour) * Emission factor (lb/ton) * 8760 hours/year * 1 ton/2000 lbs.