



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: April 20, 2006  
RE: Omni Source / 003-22024-00210  
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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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 of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar 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.

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.

Enclosures  
FNPER.dot 03/23/06



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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Omni Source  
3601 Maumee Avenue  
Fort Wayne, Indiana 46803**

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

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

Operation Permit No.: MSOP 003-22024-00210	
Issued by: Origin signed by Nisha Sizemore, Permits Branch Chief Office of Air Quality	Issuance Date: April 20, 2006  Expiration Date: April 20, 2011

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary scrap metal recycling plant.

Authorized Individual: Corporate Environmental Manager  
Source Address: 3601 Maumee Avenue, Fort Wayne, Indiana 46803  
Mailing Address: 1610 N. Calhoun Street, Fort Wayne, Indiana 46808  
General Source Phone: (260) 423-8595  
SIC Code: 5093  
County Location: Allen  
Source Location Status: Nonattainment area for 8-hour Ozone  
Attainment area for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD and Emission Offset Rules  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One automobile shredder process consisting of the following:
  - (1) One (1) automobile shredder, identified as S-3, with a nominal capacity of 200 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.
  - (2) Not to exceed twenty (20) conveyor transfer points, identified as C-1, with a nominal capacity of 200 tons per hour of wetted material.
  - (3) One (1) ferrous/non-ferrous metal separation processes consisting of two (2) magnetic separators in a series, identified as M-1A and M-1B, and a closed loop zbox/cyclone air separation system with no exhaust directed outside the units, with a combined nominal capacity of 200 tons per hour.
  - (4) One (1) conveyor transfer point, identified as C-2, with a maximum capacity of 60 tons per hour of damp material.
- (b) Three (3) metal inert gas (MIG) welding stations, with a maximum consumption of 5 pounds of electrode per hour. This unit was installed in 1996.
- (c) Five (5) stick welding stations, with a maximum consumption of 30 pounds of electrode per hour. This unit was installed in 1996.
- (d) Five (5) flame cutting stations using oxymethane, with a maximum metal cutting rate of 24 inches per minute. These units were installed in 1996.

- (e) Forty-eight (48) natural gas-fired space heaters, with a maximum heat input capacity of 9.7 MMBtu per hour.

## **SECTION B GENERAL CONDITIONS**

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

### **B.1 Permit No Defense [IC 13]**

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

### **B.2 Definitions**

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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 2-1.1-1 shall prevail.

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

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

### **B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, M 003-22024-00210, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission to which the condition pertains permanently ceases operation.

### **B.6 Modification to Permit [326 IAC 2]**

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

### **B.7 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46204

- (d) The notification 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.

**B.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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 (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; 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  
Indianapolis, Indiana 46204

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMP's 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 PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.9 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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  
Indianapolis, Indiana 46204

Any such application shall be certified by an “authorized individual” as defined by 326 IAC 2-1.1-1.

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

**B.10 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.11 Permit Renewal [326 IAC 2-6.1-7]**

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- (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  
Indianapolis, Indiana 46204

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date that it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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.

**B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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

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

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

**B.13 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) 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.

**B.14 Credible Evidence [326 IAC 1-1-6]**

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For the purposes of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

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

**C.3 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.5 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), a fugitive particulate matter emissions control plan shall be submitted within ninety (90) days after issuance of this permit.

C.6 Stack Height [326 IAC 1-7]

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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 by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

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

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- (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  
Indianapolis, Indiana 46204

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 an "authorized individual" 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) Demolition and renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

### C.8 Performance Testing [326 IAC 3-6]

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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  
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.9 Compliance Requirements [326 IAC 2-1.1-11]

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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

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

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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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.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6]

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

C.13 Response to Excursions and Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

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

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- (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 emissions unit 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 re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

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

#### Record Keeping and Reporting Requirements

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

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

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

##### C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The

records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

**C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) 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  
Indianapolis, Indiana 46204

- (b) 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.
- (c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

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

**Emissions Unit Description: Automobile Shredder**

- (a) One automobile shredder process consisting of the following:
  - (1) One (1) automobile shredder, identified as S-3, with a nominal capacity of 200 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.
  - (2) Not to exceed twenty (20) conveyor transfer points, identified as C-1, with a nominal capacity of 200 tons per hour of wetted material.
  - (3) One (1) ferrous/non-ferrous metal separation processes consisting of two (2) magnetic separators in a series, identified as M-1A and M-1B, and a closed loop zbox/cyclone air separation system with no exhaust directed outside the units, with a combined nominal capacity of 200 tons per hour.
  - (4) One (1) conveyor transfer point, identified as C-2, with a maximum capacity of 60 tons per hour of damp material.

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

**Emission Limitations and Standards**

**D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the metal shredder, ferrous/non-ferrous metal separators, and conveyors shall not exceed the values shown in the following table when operating at the process weight shown:

Emission Unit	Process Weight (tons/hr)	326 IAC 6-3-2 Allowable Emissions (lbs/hr)
Metal Shredder (S-3)	200	142.72
Conveyors (C-1, C-2)	200	142.72
Ferrous/Non-Ferrous Metal Separators (each) (M-1A, M-1B)	200	142.72

The pounds per hour limitation was calculated with the following equation:  
Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

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

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

### **Compliance Determination Requirements**

#### **D.1.3 Particulate Control**

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- (a) Pursuant to 326 IAC 6-3-2, and in order to comply with Condition D.1.1, the water sprays shall be in operation and control emissions from the metal shredder at all times that the metal shredder is in operation.
- (b) Pursuant to 326 IAC 6-3-2, and in order to comply with Condition D.1.1, the cyclones shall be in operation and control emissions from the z-box/cyclone metal separators at all times that the z-box/cyclone metal separators are in operation.

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

#### **D.1.4 Visible Emissions Notations**

---

- (a) Visible emission notations of the ferrous/non-ferrous metal separator stack exhausts shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

#### **D.1.5 Cyclone Failure Detection**

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

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

#### **D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the ferrous/non-ferrous metal separator stack exhausts once per day.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name: Omni Source</b>
<b>Address: 3601 Maumee Avenue</b>
<b>City: Fort Wayne, Indiana 46803</b>
<b>Phone #: (260) 423-8595</b>
<b>MSOP #: M003-22024-00210</b>

I hereby certify that Omni Source is  still in operation.  
 no longer in operation.

I hereby certify that Omni Source is  in compliance with the requirements of MSOP **003-22024-00210**.  
 not in compliance with the requirements of MSOP **003-22024-00210**.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>



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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for Minor Source Operating Permit (MSOP) Renewal

Source Name: Omni Source  
Source Location: 3601 Maumee Avenue, Fort Wayne, Indiana 46803  
County: Allen  
SIC Code: 5093  
Permit No.: M 003-22024-00210  
Permit Reviewer: Amy Cook

On March 2, 2006, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Omni Source had applied for a Minor Source Operating Permit (MSOP) Renewal for a scrap metal recycling plant. The notice also stated that 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.

On March 30, 2006, Omni Source submitted comments on the proposed MSOP Renewal. The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD but the permit will have the updated changes. Bold language has been added, the language with a line through it has been deleted. The Table of Contents has been modified to reflect any changes. The summary of the comments is as follows:

**Comment 1:** Omni Source's facility is currently permitted as a Registration. The Modification will increase potential emissions of the source to greater than Registration levels. Therefore, Omni Source has requested a transition to Minor Source Operating Permit status. Since the modification results in the source needing to make a transition to an operating permit issued under 326 IAC 2-6.1, new source requirements apply. Please indicate in the permit that the Minor Source Operating Permit satisfies the new source requirements under 326 IAC 2-5.1-3.

**Response to Comment 1:** This Minor Source Operating Permit is not governed by 326 IAC 2-5.1-3 because it is not a new source. The transition from Registration to MSOP is covered under 326 IAC 2-5.1-4. This MSOP meets the requirements of 326 IAC 2-5.1-4. Therefore, no changes to the permit are necessary.

**Comment 2:** Omni Source requests that those "emission units" listed within A.2(b)-(i) that qualify as insignificant activities be replaced in the permit with a description of all the insignificant activities listed within 326 IAC 2-7-1(21). An insignificant activity can be added without permit approval, and IDEM has provided this flexibility in many other permits it has issued.

**Response to Comment 2:** IDEM, OAQ agrees that in many cases insignificant activities can be added to the source without prior permit approval. However, IDEM, OAQ does not list out insignificant activities separately in a Minor Source Operating Permit (MSOP). After further discussion with Omni Source the company has decided to have the insignificant activities with negligible emissions removed from the permit. Therefore, condition A.2 has been revised as follows:

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### A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One automobile shredder process consisting of the following:
  - (1) One (1) automobile shredder, identified as S-3, with a nominal capacity of 200 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.

- (2) Not to exceed twenty (20) conveyor transfer points, identified as C-1, with a nominal capacity of 200 tons per hour of wetted material.
- (3) One (1) ferrous/non-ferrous metal separation processes consisting of two (2) magnetic separators in a series, identified as M-1A and M-1B, and a closed loop zbox/cyclone air separation system with no exhaust directed outside the units, with a combined nominal capacity of 200 tons per hour.
- (4) One (1) conveyor transfer point, identified as C-2, with a maximum capacity of 60 tons per hour of damp material.
- (b) Three (3) metal inert gas (MIG) welding stations, with a maximum consumption of 5 pounds of electrode per hour. This unit was installed in 1996.
- (c) Five (5) stick welding stations, with a maximum consumption of 30 pounds of electrode per hour. This unit was installed in 1996.
- (d) Two (2) flame cutting stations using oxymethane, with a maximum metal cutting rate of 24 inches per minute. These units were installed in 1996.
- ~~(d) A petroleum dispensing facility, dispensing at a maximum rate of 44 gallons diesel fuel per day and 66 gallons of unleaded gasoline per day. This unit was constructed in 1987.~~
- ~~(e) One (1) gasoline fuel storage tank, with a capacity of 5,000 gallons. This unit was constructed in 1987.~~
- ~~(f) One (1) diesel fuel storage tank, one (1) hydraulic fuel storage tank, one (1) motor oil tank, one (1) used motor oil tank, each having a capacity equal to 10,000 gallons.~~
- ~~(g)~~ **(e)** Forty-eight (48) natural gas-fired space heaters, with a maximum heat input capacity of 9.7 MMBtu per hour.
- ~~(g) Scrap metal storage piles.~~

**Comment 3:** The zbox/cyclone air separation system is a closed loop. The emissions are circulated within the unit and there is no stack or exhaust outside the unit. Condition D.1.4 and D.1.6 should be deleted since visible emissions are not expected. Also, please note that M-1A and M-1B are magnetic separators, not stacks.

**Response to Comment 3:** Conditions D.1.4 (Visible Emission Notations) and D.1.6 (Record Keeping Requirements) will not be removed from the permit because the controls are needed to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Also, condition D.1.4 specifically states “when venting to the atmosphere”. Therefore when the emission unit is operating as a closed loop system, the Permittee will not be required to take visible emission notations. The reference to stack exhaust M-1A and M-1B will be removed since these are not stack exhausts. Condition D.1.4(a) has been revised as follows:

#### D.1.4 Visible Emissions Notations

---

- (a) Visible emission notations of the ferrous/non-ferrous metal separator stack exhausts (~~M-1A and M-1B~~) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

**Comment 4:** Section A.2(d) mistakenly identifies two (2) flame cutting stations using oxymethane, with a metal cutting rate of 24 inches per minute. There are actually five (5) such cutting stations at this facility. It appears that this activity is regulated by 326 IAC 6-3 because more than 3400 inches per minute can be cut. However, this activity is already addressed within the MSOP condition C.1 (326 IAC 6-3-2(e)(2)) by limiting any non-exempt process with a maximum process weight rate less than 100 lb/hour to 0.551 lb/hour particulate.

**Response to comment 4:** IDEM, OAQ agrees. The five (5) flame cutting stations will be covered by Condition C.1 (326 IAC 6-3-2(e)(2)) which limits non-exempt process with a maximum process weight rate less than 100 lb/hour to 0.551 lb/hour particulate. Therefore, the following revision will be made to A.2(d) (Emissions Units and Pollution Control Equipment Summary). No changes will be made to the TSD. However there will be an increase in emissions from the five (5) flame cutting stations. Therefore, updated calculations are attached with this addendum (Appendix A). Condition A.2(d) has been revised as follows:

**D.1.2 Emissions Units and Pollution Control Equipment Summary**

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

...(d) ~~Two (2)~~ **Five (5)** flame cutting stations using oxymethane, with a maximum metal cutting rate of 24 inches per minute. These units were installed in 1996....

Upon further review, the IDEM, OAQ has decided to make the following revisions to the permit.

1. Cover Page – Signature Block, the branch chief title has been changed to reflect the current branch chief.

Operation Permit No.: MSOP 003-22024-00210	
Issued by: <del>Paul Dubonetzky, Assistant Commissioner</del> <b>Nisha Sizemore, Permits Branch Chief</b> Office of Air Quality	Issuance Date:  Expiration Date:

2. IDEM, OAQ has decided to include the following updates to further address and clarify the permit term and term of the conditions. This includes changes to condition B.4 (Permit Term and Renewal) and the addition of of the conditions titled Term of Conditions and Permit Renewal. Therefore, the following revisions have been made to the perm:

**B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

**(a)** This permit, **M 003-22024-00210**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, **modifications, or amendments** of this permit do not affect the expiration date **of this permit**.

~~The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this~~

~~permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.~~

- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

#### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission to which the condition pertains permanently ceases operation.

#### **B.11 Permit Renewal [326 IAC 2-6.1-7]**

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- (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  
Indianapolis, Indiana 46204

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date that it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 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.

3. B.8 (Revised as B.9) (Permit Revision) – IDEM, OAQ has decided to remove (d) from this

condition. Therefore, condition B.9(d) has been revised as follows:

**B.9** Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

~~... (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.~~

**Appendix A: Emissions Calculations**  
**Welding and Thermal Cutting**

Company Name: Omni Source  
 Address City IN Zip: 3601 Maumee Avenue, Fort Wayne, Indiana 46801  
 Permit Number: M 003-22024-00210  
 Plt ID: 003-00210  
 Reviewer: Amy Cook  
 Date: January 11, 2006

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	3	5		0.0055	0.0005			0.083	0.008	0.000	0	0.008
Stick (E7018 electrode)	5	30		0.0211	0.0009			3.165	0.135	0.000	0	0.135
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxymethane	5	1	24	0.0815	0.0002		0.0002	0.587	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								3.83				0.14
Potential Emissions lbs/day								92.02				3.42
Potential Emissions tons/year								16.79				0.62

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Omni Source</b>
<b>Source Location:</b>	<b>3601 Maumee Avenue, Fort Wayne, Indiana 46803</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>5093</b>
<b>Operation Permit No.:</b>	<b>R 003-17112-00210</b>
<b>Operation Permit Issuance Date:</b>	<b>July 22, 2003</b>
<b>Permit No.:</b>	<b>M 003-22024-00210</b>
<b>Permit Reviewer:</b>	<b>Amy Cook</b>

The Office of Air Quality (OAQ) has reviewed an application from Omni Source relating to the construction and operation of a scrap metal recycling plant.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One automobile shredder process consisting of the following:
  - (1) One (1) automobile shredder, identified as S-3, with a nominal capacity of 200 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.
  - (2) Not to exceed twenty (20) conveyor transfer points, identified as C-1, with a nominal capacity of 200 tons per hour of wetted material.
  - (3) One (1) ferrous/non-ferrous metal separation processes consisting of two (2) magnetic separators in a series, identified as M-1A and M-1B, and a closed loop zbox/cyclone air separation system with no exhaust directed outside the units, with a combined nominal capacity of 200 tons per hour.
  - (4) One (1) conveyor transfer point, identified as C-2, with a maximum capacity of 60 tons per hour of damp material.
- (b) Three (3) metal inert gas (MIG) welding stations, with a maximum consumption of 5 pounds of electrode per hour. This unit was installed in 1996.
- (c) Five (5) stick welding stations, with a maximum consumption of 30 pounds of electrode per hour. This unit was installed in 1996.
- (d) Two (2) flame cutting stations using oxymethane, with a maximum metal cutting rate of 24 inches per minute. These units were installed in 1996.

- (e) A petroleum dispensing facility, dispensing at a maximum rate of 44 gallons diesel fuel per day and 66 gallons of unleaded gasoline per day. This unit was constructed in 1987.
- (f) One (1) gasoline fuel storage tank, with a capacity of 5,000 gallons. This unit was constructed in 1987.
- (g) One (1) diesel fuel storage tank, one (1) hydraulic fuel storage tank, one (1) motor oil tank, one (1) used motor oil tank, each having a capacity equal to 10,000 gallons.
- (h) Forty-eight (48) natural gas-fired space heaters, with a maximum heat input capacity of 9.7 MMBtu per hour.
- (i) Scrap metal storage piles.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

### **Existing Approvals**

The source has been operating under previous approvals including, but no limited to, the following:

- (a) R 003-17112-00210, issued on July 22, 2003; and

All conditions from previous approvals were incorporated into this permit.

### **Air Pollution Control Justification as an Integral Part of the Process**

The company has submitted the following justifications such that the water sprays on the metal shredder and the cyclones on the two (2) ferrous/non-ferrous metal separators are an integral part of the metal shredding and metal separation processes, respectively. Therefore, the potential to emit calculations included emissions after the water spray and cyclone. The justifications for the water sprays on the metal shredder and cyclones on the two (2) ferrous/non-ferrous metal separation processes are as follows:

Metal shredder process description:

- (a) The materials inputs to the metal shredder consist primarily of crushed and uncrushed automobile bodies. These vehicle bodies typically contain flammable liquids and flammable solids. The high speed shearing action of the cutters on the metal shredder creates high instantaneous temperatures and sparks. The simultaneous presence of flammable materials and ignition sources may result in fires and explosions within the machinery. In order to prevent this, water sprays are directed at the metal shredder's material input chute, cutterhead and materials output chute, thereby thoroughly wetting the material before, during and after it is shredded. This wetting process both prevents explosions within the machinery and extinguishes any materials that ignite.

Justification for integral to the process:

- (1) Any fire or explosion of flammable materials within the machinery would damage it and, therefore, must be prevented. Also, any solid materials that caught fire would be transported via automatic conveyor to downline processes, with the possibility of damaging other equipment.
- (2) The water sprays have an overall positive net economic effect, and are designed by the manufacturer of the equipment to operate whenever the shredder operates. The constant operation of the water sprays while the shredder is in operation prevents explosions and fires which could result in damage to the

shredding machine and unplanned shutdowns of the process. Damage to the machinery would result in repair and replacement costs. Process shutdowns would result in loss of revenue. Either of these results would have substantial negative financial impacts on the company.

Metal separator sorts process description:

- (b) The z-box/cyclone in the ferrous/nonferrous metal separator sorts the shredded metal into ferrous, nonferrous and mixed (tramp) metals by use of an air powered centripetal process. Upon entering the metal separator, the stream of shredded metal is first sorted with magnets into ferrous and non-ferrous materials streams. The "ferrous" materials" stream (which, at this point in the process still contains about 4% non-ferrous materials by weight) then enters the z-box/cyclone where, by use of air currents, it is spun, sorted, separated and collected into ferrous and non-ferrous material streams.

Justification for integral to the process:

- (1) The z-box/cyclone is part of the materials sorting and collection mechanism. Its use enables high quality sorting of the input material into ferrous and non-ferrous materials in a one-pass-through operation. (Without use of the cyclone, a poor quality sorting of materials occurs, requiring reprocessing.)
- (2) The process cannot operate without the z-box/cyclone. The cyclone creates the air current needed in the z-box/cyclone to sort the shredded metal that passes through the z-box/cyclone into ferrous and nonferrous materials. Without the air current, the shredded metal is not sorted.

IDEM, OAQ has evaluated the justifications and agreed to the following:

- (1) The water sprays on the metal shredder will be considered as an integral part of the metal shredding process based on safety measures necessary to ensure proper operation of the process. This has been verified by a written letter from the manufacturer supporting the company's claim.
- (2) The cyclones on the two (2) ferrous/non-ferrous metal separators will be considered as an integral part of the metal separation process because the two (2) cyclones serve as pneumatic conveying for the material.

Therefore, the permitting level will be determined using the potential to emit after the water sprays and cyclones.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

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

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

A complete application for the purposes of this review was received on November 21, 2005.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 6).

### Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	40.12
PM-10	38.21
SO <sub>2</sub>	0.03
VOC	0.78
CO	3.57
NO <sub>x</sub>	4.25

HAPs	Potential to Emit (tons/yr)
Single HAP	Negligible
Combination HAPs	Negligible
Total	Negligible

- (a) The potential to emit of all criteria pollutants is less than one hundred (100) tons per year and the potential to emit of PM is greater than twenty-five (25) tons per year. The potential to emit of hazardous air pollutants (HAPs) is less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Non-attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxide (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (b) Allen County has been designated as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source Section.
- (c) Allen County has been classified as attainment or unclassifiable 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. See the State Rule Applicability for the source section.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	40.12
PM-10	38.21
SO <sub>2</sub>	0.03
VOC	0.78
CO	3.57
NO <sub>x</sub>	4.25
Single HAP	Negligible
Combination HAPs	Negligible

- (a) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or greater, no attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or greater, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Minor Source Operating Permit (MSOP) application submitted by the company.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit **003-22024-00210**, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

### **Federal Rule Applicability**

- (a) 40 CFR 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.  
One (1) gasoline fuel storage tank, one (1) diesel fuel storage tank, one (1) hydraulic fuel storage tank, one (1) motor oil tank, and one (1) used motor oil tank are not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.110b, Subpart Kb) because each tank's capacity is less than 75 cubic meters (19,812 gallons). Therefore, the requirements of 40 CFR 60, Subpart Kb are not included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

### **State Rule Applicability – Entire Source**

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

The potential to emit (PTE) of all criteria pollutants is less than two hundred fifty (250) tons per year. Therefore, this source is a minor source and 326 IAC 2-2 (PSD) does not apply. This source was constructed in 1987 and it is not one of the 28 listed source categories.

#### 326 IAC 2-3 (Emission Offset)

This source is located in Allen County. Allen County was designated as nonattainment for the 8-hour ozone standard. The potential to emit (PTE) of VOC and NO<sub>x</sub> for this source is less than one hundred (100) tons per year. Therefore, this source is a minor source and 326 IAC 2-3 (Emission Offset) does not apply.

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

The operation of this scrap metal recycling plant will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an Operating Permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead in the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter County.

#### 326 IAC 5-1 (Opacity Limitations)

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

#### 326 IAC 6-4 (Fugitive Dust Emissions)

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 6-5-1(b) (Fugitive Particulate Matter Emission Limitations)**

This source is subject to this rule because it is a new source of particulate matter (PM) which did not receive all necessary preconstruction approvals before December 13, 1985, it is located in Allen county, and and it requires a permit as set forth in 326 IAC 2. Therefore, pursuant to 326 IAC 6-5-3(a) (Submission of Control Plan), the source shall submit a fugitive particulate matter emissions control plan or request an exemption from the control plan within six (6) months following December 13, 1985. The source has not submitted a particulate matter emissions control plan, therefore one must be submitted within ninety (90) days after issuance of this permit.

**326 IAC 1-7 (Stack Height)**

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 by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

**State Rule Applicability – Petroleum Dispensing Facility, Storage Tanks**

**326 IAC 8-1-6 (New Facilities – General Reduction Requirements (BACT))**

The petroleum dispensing facility does not have potential VOC emissions equal to or greater than twenty-five (25) tons per year, therefore this source is not subject to the requirements of 326 IAC 8-1-6 (BACT).

**326 IAC 8-4-6 (Gasoline Dispensing Facilities)**

This source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities) because the source dispenses less than 10,000 gallons of gasoline per month and was existing prior to July 1, 1989.

**326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)**

This source is not subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) because each tank's capacity is less than 39,000 gallons.

**326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)**

The one (1) gasoline fuel storage tank, one (1) diesel fuel storage tank, one (1) hydraulic fuel storage tank, one (1) motor oil tank, and one (1) used motor oil tank are not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) do not apply to these facilities.

**State Rule Applicability – Automobile Shredder**

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

Pursuant to 326 IAC 6-3-2, the particulate from the metal shredder, ferrous/non-ferrous metal separators, and conveyors shall be limited by the following:

Emission Unit	Process Weight (tons/hr)	326 IAC 6-3-2 Allowable Emissions (lbs/hr)
Metal Shredder (S-3)	200	142.72
Conveyors (C-1, C-2)	200	142.72
Ferrous/Non-Ferrous Metal Separators (each) (M-1A, M-1B)	200	142.72

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

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

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

The water sprays shall be in operation at all times the metal shredder is in operation, in order to comply with this limit.

The cyclones shall be in operation at all times the z-box/cyclone metal separators are in operation, in order to comply with this limit.

Calculations show that particulate emissions from the metal shredder (S-3), the ferrous/non-ferrous metal separators (M-1A, M-1B) and the conveyors (C-1, C-2) will be in compliance with these limits. (See Appendix A).

### **State Rule Applicability – Welding Facilities**

326 IAC 6-3 (Particulate Matter Emission Limitations from Manufacturing Processes)

This source is not subject to 326 IAC 6-3-1 (Particulate Matter Emission Limitations from Manufacturing Processes) because the welding facility consumes less than six hundred and twenty-five (625) pounds of rod or wire per day.

### **State Rule Applicability – Space Heaters, Scrap Metal Storage Piles**

There are no specifically applicable requirements that apply to these emissions units.

### **Compliance Requirements**

Permits issued under 326 IAC 2-6.1 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 2-6.1-5. 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 in 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 source are as follows:

1. The ferrous/non-ferrous metal separator stack exhausts (M-1A and M-1B) has applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the ferrous/non-ferrous metal separator stack exhausts (M-1A and M-1B) shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.
- (f) In the event that cyclone failure has been observed:  
  
Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

The cyclones for the ferrous/non-ferrous metal separators must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-6 (MSOP).

## **Conclusion**

The operation of this scrap metal recycling plant shall be subject to the conditions of the Minor Source Operating Permit 003-22024-00210.

Company: Omni Source  
 Address: 3601 Maumee Avenue, Fort Wayne, Indiana 46803  
 Permit No. M 003-22024-00210  
 Reviewer: Amy Cook  
 Date: January 11, 2006

## Emission Summary

POTENTIAL TO EMIT - Table 1

	PM	PM10	SO2	NOx	VOC	CO
Natural Gas Fired Combustion Units	0.08	0.32	0.03	4.25	0.23	3.57
Dispensing Facility					0.55	
Welding Operation	15.25	15.25				
<b>SUM</b>	<b>15.33</b>	<b>15.57</b>	<b>0.03</b>	<b>4.25</b>	<b>0.78</b>	<b>3.57</b>

POTENTIAL TO EMIT - Table 2

	PM	PM10	SO2	NOx	VOC	CO
Shredder	9.55	9.55				
conveyor transfer (wet)	2.45	0.81				
conveyor transfer (dry)	0.79	0.29				
magnetic seperator	12.00	12.00				
<b>SUM</b>	<b>24.79</b>	<b>22.64</b>				

POTENTIAL TO EMIT

	PM	PM10	SO2	NOx	VOC	CO
Table 1	15.33	15.57	0.03	4.25	0.78	3.57
Table 2	24.79	22.64	0	0	0	0
<b>TOTAL</b>	<b>40.12</b>	<b>38.21</b>	<b>0.03</b>	<b>4.25</b>	<b>0.78</b>	<b>3.57</b>

Company Name: Omni Source  
 Address: 3601 Maumee Avenue, Fort Wayne, Indiana 46803  
 Permit No.: M 003-22024-00210  
 Reviewer: Amy Cook  
 Date: January 11, 2006

## Shredder

Process Description	Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (lb/hr)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)
Metal Shredder	200	0.0109	<b>2.18</b>	9.55	0.0109	9.55

Assume all PM emissions are equal to PM10.

Material is wetted with water sprays at input feed, cutter head and output feed to minimize explosion and fire hazards.

The emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.D.1, for a comparable metal shredder (1996).

### METHODOLOGY

PTE of PM/PM10 (tons/year) = Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hrs/year) x 1 ton/2000 lbs

Process Description	Number of Emission Points	Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (lb/hr)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)
Conveyor Transfer Point - wet	20	200	1.40E-04	<b>2.80E-02</b>	2.45	4.60E-05	0.81
Conveyor Transfer Point - dry*	1	60	3.00E-03	<b>1.80E-01</b>	0.79	1.10E-03	0.29

The emission factor for conveyor transfer point - wet is from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04).

The emission factor for conveyor transfer point - dry is from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04).

\*The conveyor transfer point is a damp process. The emission factor for a dry process was used as a worst case.

### METHODOLOGY

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

Process Description	Number of Emission Points	Combined Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (lb/hr)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)
z-box ferrous/ Non-ferrous metal separators	2	200	1.37E-02	<b>2.74</b>	12.00	1.37E-02	12.00

The emission factor for the ferrous/non-ferrous metal separators are from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-11.E, for a comparable metal separator (1996).

### METHODOLOGY

PTE of PM/PM10 (tons/year) = Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hrs/year) x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
VOC Emissions  
From Petroleum Dispensing Facility**

**Company Name:** OmniSource

**Address:** 3601 Maumee Avenue, Fort Wayne, Indiana 46803

**Pit ID:** 003-00210

**Reviewer:** Amy Cook

**Date:** January 11, 2006

**Potential To Emit from Filling Operation**

Material	Max. Throughput (gal/day)	*Emission Factor (lb/10 <sup>3</sup> gal)	VOC Emissions		PTE VOC (tons/year)
			(lbs/day)	(lbs/year)	
Diesel No.2	44	11.5	0.506	144.7	0.22
Unleaded Gasoline	66	11.5	0.759	217.1	0.33
					0.55

\* Emission factor from AP-42, Chapter 5, Table 5.2-7 Splash Filling (January, 1995)

**Methodology**

VOC Emissions (lbs/day) = Max. throughput (gallons/day) \* Emission rate (lbs/1000 gallons)

VOC emissions (lbs/year) = Max. throughput (gallons/day) \* Emission rate (lbs/1000 gallons) \* 286 days of operation/year

PTE VOC (tons/year) = Max. throughput (gallons/day) \* Emission rate (lbs/1000 gallons) \* 286 days of operation/year \* 1 year/2860 hours \* 8760 hours/year \* 1 ton/2000 lb

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

**Company Name: Omni Source**  
**Address City IN Zip: 3601 Maumee Avenue, Fort Wayne, Indiana 46803**  
**Permit Number: M 003-22024-00210**  
**Pit ID: 003-00210**  
**Reviewer: Amy Cook**  
**Date: January 11, 2006**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

9.70

85.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.08	0.32	0.03	4.25	0.23	3.57

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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



See page 5 for HAPs emissions calculations.

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

**Company Name: Omni Source**  
**Address City IN Zip: 3601 Maumee Avenue, Fort Wayne, Indiana 46803**  
**Permit Number: M 003-22024-00210**  
**Pit ID: 003-00210**  
**Reviewer: Amy Cook**  
**Date: January 11, 2006**

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	8.922E-05	5.098E-05	3.186E-03	7.647E-02	1.445E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.124E-05	4.673E-05	5.948E-05	1.614E-05	8.922E-05

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations**  
**Welding and Thermal Cutting**

Company Name: Omni Source  
 Address City IN Zip: 3601 Maumee Avenue, Fort Wayne, Indiana 46801  
 Permit Number: M 003-22024-00210  
 Plt ID: 003-00210  
 Reviewer: Amy Cook  
 Date: January 11, 2006

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	3	5		0.0055	0.0005			0.083	0.008	0.000	0	0.008
Stick (E7018 electrode)	5	30		0.0211	0.0009			3.165	0.135	0.000	0	0.135
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxymethane	2	1	24	0.0815	0.0002		0.0002	0.235	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								3.48				0.14
Potential Emissions lbs/day								83.57				3.42
Potential Emissions tons/year								15.25				0.62

METHODOLOGY

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb