



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: December 20, 2007  
RE: Summit, Inc. / 089-25273-00529  
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/03/07



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100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
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## New Source Construction and Minor Source Operating Permit

### OFFICE OF AIR QUALITY AND GARY DEPARTMENT OF ENVIRONMENTAL AFFAIRS

**Summit, Inc.  
6901 West Chicago Avenue  
Gary, Indiana 46406**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source 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 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M089-25273-00529	
Original signed by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 20, 2007  Expiration Date: December 20, 2012

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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) and Gary Department of Environmental Affairs (GDEA). 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.

Source Address:	6901 West Chicago Avenue, Gary, Indiana 46406
Mailing Address:	6901 West Chicago Avenue, Gary, Indiana 46406
General Source Phone Number:	219-944-9749
SIC Code:	5093
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone and 1-hour ozone standards Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) vehicle/metal shredder, identified as EU002, approved for construction in 2007, with a maximum capacity of 100 tons per hour, using three (3) water sprayer nozzles for particulate matter control;
- (b) One (1) Z-box cleaning system for metal/fluff separation, identified as EU001, approved for construction in 2007, with a maximum capacity of 100 tons per hour, using a cyclone for particulate matter control, exhausting to stack S001, with an exhaust flow rate of 15,000 dscfm;
- (c) One (1) conveyor system, identified as EU003, approved for construction in 2007, consisting of sixteen (16) conveyor transfer points, with a maximum capacity to transfer and convey 100 tons per hour, using water sprayers for particulate matter control;
- (d) Paved roads and parking lots with public access; and
- (e) Scrap metal storage piles.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-1.1-1]**

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

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### **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, M089-25273-00529, 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 and GDEA, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.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 unit to which the condition pertains permanently ceases operation.

#### B.6 Enforceability

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- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and GDEA, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by GDEA.

#### B.7 Severability

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

#### B.8 Property Rights or Exclusive Privilege

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

#### B.9 Duty to Provide Information

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- (a) The Permittee shall furnish to IDEM, OAQ and GDEA, within a reasonable time, any information that IDEM, OAQ and GDEA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and GDEA copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### B.10 Certification

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual 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) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251

and

Gary Department of Environmental Affairs  
839 Broadway, 2nd Floor NE  
Gary, Indiana 46402

(c) 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 and GDEA on or before the date it is due.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Gary Department of Environmental Affairs  
839 Broadway, 2nd Floor NE  
Gary, Indiana 46402

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 PMPs shall be submitted to IDEM, OAQ and GDEA upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and GDEA. IDEM, OAQ and GDEA may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M089-25273-00529 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.15 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 GDEA and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Gary Department of Environmental Affairs  
839 Broadway, 2nd Floor NE  
Gary, Indiana 46402

- (b) A timely renewal application is one that is:

- (1) Submitted at least ninety (90) days 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 and GDEA on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ and GDEA 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 and GDEA any additional information identified as being needed to process the application.

**B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
Gary Department of Environmental Affairs  
839 Broadway, 2nd Floor NE  
Gary, Indiana 46402  
  
Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(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.17 Source Modification Requirement**

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

**B.18 Inspection and Entry**

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[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, and GDEA 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 the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Gary Department of Environmental Affairs  
839 Broadway, 2nd Floor NE  
Gary, Indiana 46402

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.20 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ and GDEA 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.21 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

#### C.1 Permit Revocation [326 IAC 2-1.1-9]

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

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

#### C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

**C.6 Fugitive Dust Emissions [326 IAC 6.8-10] [326 IAC 6.8-11]**

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- (a) Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:
- (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
  - (2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
  - (3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
  - (4) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
  - (5) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
  - (6) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
  - (7) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
  - (8) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
  - (9) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
  - (10) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
  - (11) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.
- (b) The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the attached Fugitive Dust Control Plan, submitted on October 15, 2007.
- (c) The source is subject to 326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures), because it is subject to the requirements of 326 IAC 6.8-10. Pursuant to this rule, the source shall comply with the requirements of 326 IAC 6.8-11-4 and 326 IAC 6.8-11-6.

**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  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Gary Department of Environmental Affairs  
839 Broadway, 2nd Floor NE  
Gary, Indiana 46402

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 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and Renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana 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.

**Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

**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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Gary Department of Environmental Affairs  
839 Broadway, 2nd Floor NE  
Gary, Indiana 46402

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and GDEA not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and GDEA 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 [326 IAC 2-6.1-5(a)(2)]**

### **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]**

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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.

## **Corrective Actions and Response Steps**

### **C.13 Response to Excursions or Exceedances**

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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; and/or

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall 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 and GDEA, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**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]

- (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 or GDEA makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or GDEA within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Gary Department of Environmental Affairs  
839 Broadway, 2nd Floor NE  
Gary, Indiana 46402

- (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 and GDEA on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by 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 UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) vehicle/metal shredder, identified as EU002, approved for construction in 2007, with a maximum capacity of 100 tons per hour, using three (3) water sprayer nozzles for particulate matter control;
- (b) One (1) Z-box cleaning system for metal/fluff separation, identified as EU001, approved for construction in 2007, with a maximum capacity of 100 tons per hour, using a cyclone for particulate matter control, exhausting to stack S001, with an exhaust flow rate of 15,000 dscfm;
- (c) One (1) conveyor system, identified as EU003, approved for construction in 2007, consisting of sixteen (16) conveyor transfer points, with a maximum capacity to transfer and convey 100 tons per hour, using water sprayers for particulate matter control.

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

#### D.1.1 Particulate [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), particulate emissions from EU001, EU002, and EU003 shall not exceed 0.03 grains per dry standard cubic foot (dscf) each.

#### D.1.2 PM and PM10 [326 IAC 2-6.1]

- (a) PM and PM10 emissions from the one (1) vehicle/metal shredder, identified as EU002, shall not exceed 0.0109 pounds per ton of metal shredded.
- (b) PM and PM10 emissions from the one (1) Z-box cleaning system, identified as EU001, shall not exceed 0.037 pounds per ton of metal/fluff separated.

Compliance with these limits combined with the potential PM and PM10 emissions from all other emission units at this source will limit the source-wide total potential to emit of PM and PM10 to less than 100 tons per 12 consecutive month period and will render 326 IAC 2-7 (Part 70 Permits) not applicable. PM10 emissions will be used as a surrogate for PM2.5.

#### D.1.3 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.1.4 Particulate Control

- (a) Pursuant to 326 IAC 6.8-1-2, and in order to comply with Condition D.1.1, water sprayer nozzles shall be in operation and control emissions from the metal shredder (EU002) at all times that the metal shredder is in operation.
- (b) Pursuant to 326 IAC 6.8-1-2, and in order to comply with Condition D.1.1, the cyclone shall be in operation and control emissions from the Z-box cleaning system at all times the Z-box cleaning system (EU001) is in operation.

#### D.1.5 Testing Requirements [326 IAC 2-1.1-11]

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In order to demonstrate compliance with Conditions D.1.2(a) and (b), the Permittee shall perform PM and PM10 testing for the one (1) vehicle/metal shredder, identified as EU002 and the one (1) Z-box cleaning system, identified as EU001, within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup, utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

#### Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

##### D.1.6 Visible Emissions Notations

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- (a) Visible emission notations of the stack S001 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.1.7 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.

##### D.1.8 Water Spray System Failure Detection

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In the event that water spray system 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 2-6.1-5(a)(2)]

##### D.1.9 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.6, the Permittee shall maintain daily records of visible emission notations of stack S001. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) 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**

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: Summit, Inc.  
Source Address: 6901 West Chicago Avenue, Gary, Indiana 46406  
Mailing Address: 6901 West Chicago Avenue, Gary, Indiana 46406  
MSOP No.: M089-25273-00529

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Notification
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

**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:</b>	Summit, Inc.
<b>Address:</b>	6901 West Chicago Avenue
<b>City:</b>	Gary, Indiana 46406
<b>Phone #:</b>	219-944-9749
<b>MSOP #:</b>	M089-25273-00529

I hereby certify that Summit, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Summit, Inc. is :

in compliance with the requirements of MSOP M089-25273-00529.

not in compliance with the requirements of MSOP M089-25273-00529.

<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>

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

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

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

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

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

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

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

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

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

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

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

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Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Summit, Inc.  
6901 West Chicago Avenue  
Gary, Indiana 46406

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Summit, Inc., 6901 West Chicago Avenue, Gary, Indiana 46406, completed construction of the scrap metal recycling plant on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 11, 2007 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M089-25273-00529, Plant ID No. 089-00529 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_

Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_

Name \_\_\_\_\_ (typed or printed)

## Attachment A

### Fugitive Dust Control Plan

Source Name: Summit, Inc.  
 Source Address: 6901 West Chicago Avenue, Gary, Indiana 46406  
 Mailing Address: 6901 West Chicago Avenue, Gary, Indiana 46406  
 MSOP No.: M089-25273-00529

326 IAC 6.8-10-4(3) Compliance Requirements; Control Plans

(3)(B) Process Description: Automotive and White-Scrap Metal Shredding

(C) See attached site layout diagram

(D)(i) The road is approximately 5,790 feet long and 20 feet wide. The average daily traffic is approximately 213 vehicles, which includes semi trucks, heavy equipment, and pickup trucks. The surface silt loading is 9.7 g/m<sup>2</sup>.

(D)(ii) Storage Pile Descriptions

Storage Pile Descriptions					
Process	Material	Moisture Content (%)	Silt Content (%)	Throughput (tons/hr)	Equipment
P01	Ferrous	2.00%	<1%	< 70.0	Pay Loader/Bulldozer
P02	Non-Ferrous	2.00%	<1%	< 19.0	Pay Loader/Bulldozer
P03	Long Throw	2.00%	<1%	< 4.0	Pay Loader/Bulldozer
P04	Non-Ferrous Waste	2.00%	<1%	< 3.0	Pay Loader/Bulldozer
P05	Non-Ferrous Fines	2.00%	<1%	< 2.0	Pay Loader/Bulldozer
P06	By-Pass Stacking Non-Ferrous Material	2.00%	<1%	< 2.0	Pay Loader/Bulldozer

(D)(iii) See attached Process Flow Diagram.

(D)(iv) Pay loaders and bulldozer will transport the majority of the material from the storage piles. The shredder will transfer material using conveyor belts and gravity fed shoots.

(E) See attached Fugitive Dust Control Measures.

(4)(B) A dust control spray logbook will be kept to record the following information for each application of water or chemical solution to roadways:

- i. Location
- ii. Application Rate

- iii. Time
- iv. Spray Width
- v. Method of application
- vi. Quantity of water/chemical used
- vii. Chemical concentration
- viii. MSDS sheets for each chemical

- (C) No dry chemical dust suppressants will be used.
- (D) Logs will be kept on a regular basis. In the event of a missed application the reason will be recorded.
- (E) Copies of the logbook will be available to IDEM within twenty (20) working days of written request by IDEM.
- (F)(i) Logbook records shall be kept no less than three (3) years.
- (F)(ii) Logbooks will be available for inspection and copying by IDEM representatives during working hours.
- (G) A quarterly report shall be submitted to IDEM containing the following:
  - i. The dates any required control measures were not implemented
  - ii. A listing of those control measures
  - iii. The reasons that the control measures were not implemented
  - iv. Any corrective action taken.

This report will be submitted within thirty (30) days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.

- (5) EPA guidelines will be followed on reporting of measures used and effectiveness of control practices and measures.

## FUGITIVE DUST CONTROL MEASURES

Source Name: Summit, Inc.  
Source Address: 6901 West Chicago Avenue, Gary, Indiana 46406  
Mailing Address: 6901 West Chicago Avenue, Gary, Indiana 46406  
MSOP No.: M089-25273-00529

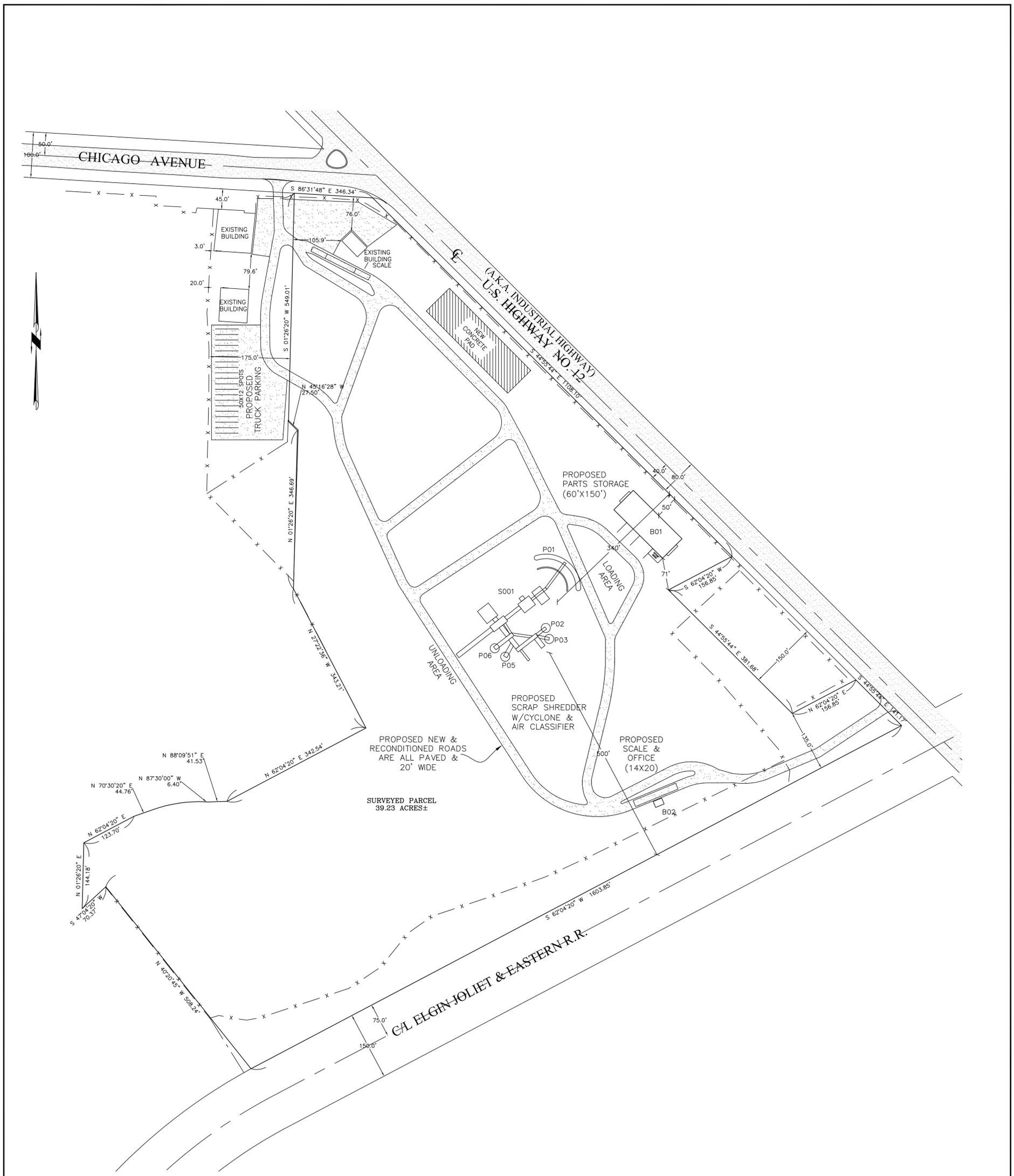
- (a) Fugitive particulate matter (dust) emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following measures on an as needed basis:
  - (1) Paved roads and parking lots:
    - (A) cleaning by vacuum sweeping on an as needed basis;
    - (B) flushing on an as needed basis; and/or
    - (C) power brooming while wet either from rain or application of water on an as needed basis.
  - (2) Unpaved roads and parking lots:
    - (A) paving with asphalt or concrete;
    - (B) treating with emulsified asphalt (or other suitable and effective oil or chemical dust suppressant approved by IDEM OAQ) on an as needed basis;
    - (C) treating with water on an as needed basis; and/or
    - (D) double chipping, sealing, and maintaining the road surface on an as needed basis.
- (b) Fugitive particulate matter (dust) emissions from material (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) storage piles shall be controlled by one or more of the following measures on an as needed basis:
  - (1) maintaining minimum size and number of storage piles;
  - (2) treating around the storage pile area with emulsified asphalt on an as needed basis;
  - (3) treating around the storage pile area with water on an as needed basis; and/or
  - (4) treating the storage piles with water on an as needed basis.
- (c) Fugitive particulate matter (dust) emissions from the transferring of materials (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) shall be controlled by one of the following measures on an as needed basis:
  - (1) locating storage piles as close as possible to feed bins;
  - (2) limiting transfer points to three foot drops or less.
  - (3) enclosing the transfer points; and/or
  - (4) applying water to the materials on an as needed basis.
- (d) Fugitive particulate matter (dust) emissions from transporting of materials (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) shall be controlled by one of the following measures on an as needed basis:
  - (1) tarping the materials hauling vehicles;
  - (2) insuring tailgates are tight and do not leak;
  - (3) applying water to the materials on an as needed basis; and/or
  - (4) maintaining a 10 MPH speed limit in the yard.

(e) Fugitive particulate matter (dust) emissions from the loading and unloading of materials (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) shall be controlled by one of the following measures on an as needed basis:

- (1) limiting free fall distance;
- (2) limiting the rate of discharge of the materials; and/or
- (3) applying water to the materials on an as needed basis.

(f) Fugitive particulate matter (dust) emissions from material (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) feed bins, conveyors, transfer points, screens, and/or crushers shall be controlled by the following measure on an as needed basis:

- (1) limiting transfer points to three foot drops or less.
- (2) enclosing the conveyors, transfer points, screens, and/or crushers; and/or
- (3) applying water to the materials on an as needed basis.



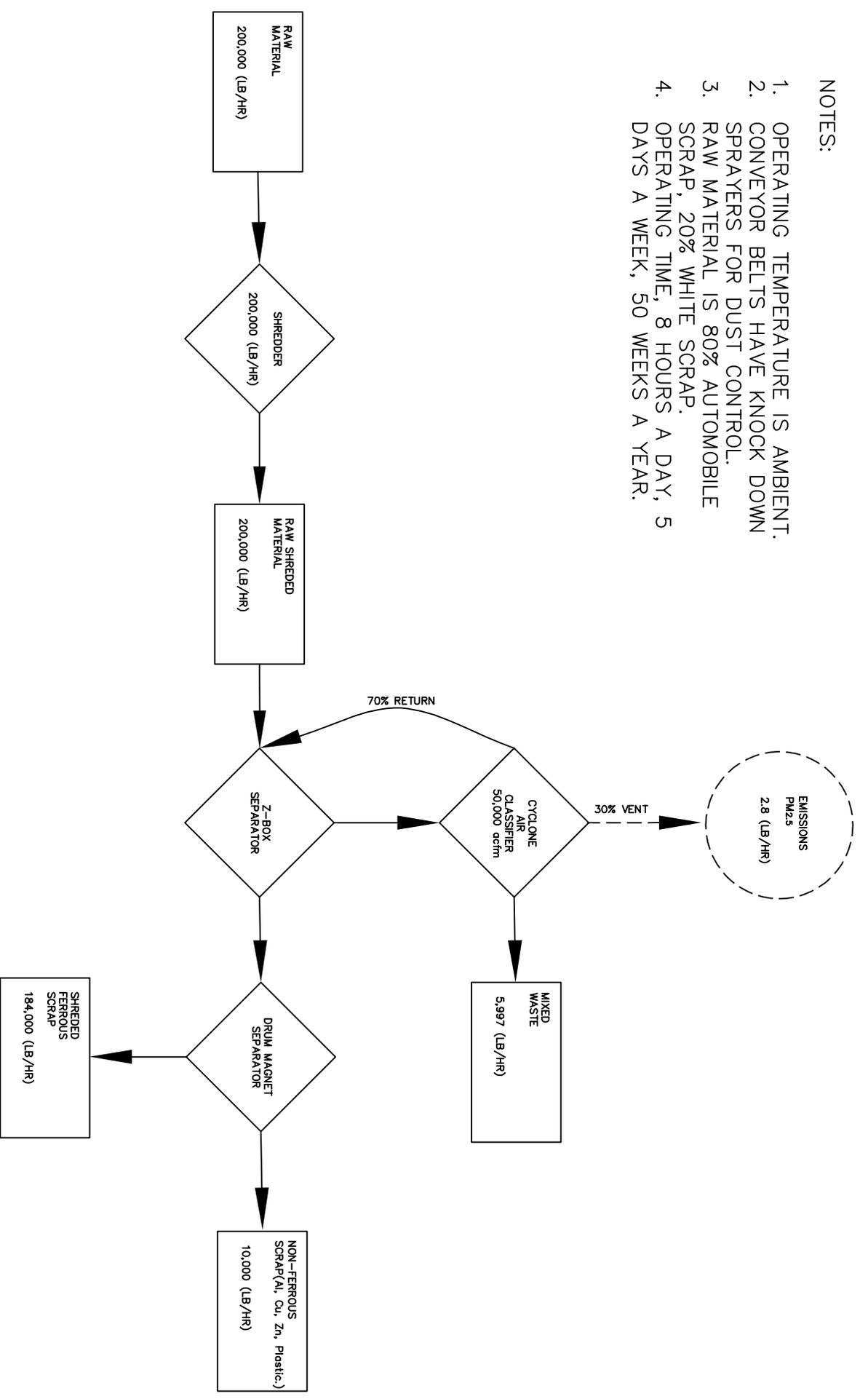
SURVEYED PARCEL  
39.23 ACRES±

PROPOSED NEW &  
RECONDITIONED ROADS  
ARE ALL PAVED &  
20' WIDE

Owner:  
Summit, Inc.  
6901 West Chicago Ave.  
Gary, IN 46406

<p>LEGEND</p>	<p>SCALE IN FEET</p>	<p>REVISIONS</p>	<p>DRAWN BY: SAH CHECKED BY: JTH APPROVED BY: JTH DRAWING DATE: 10/15/07</p>	<p><b>GREAT LAKES ENGINEERING, Inc.</b> ENGINEERS and SURVEYORS</p>	<p>6084 Lute Road P.O. Box 1036 Portage, IN 46368 219.762.3559 www.greatlakeseng.net</p>	<p>DRAWING FILE SURVEYBASE SURVEY BOOK 01.02/ 00.00</p>	<p>PRELIMINARY SITE PLAN SUMMIT, INC. GARY, IN</p>	<p>SHEET 1 of 1 PROJECT WSC01 SCALE 1" = 100'</p>
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- NOTES:
1. OPERATING TEMPERATURE IS AMBIENT.
  2. CONVEYOR BELTS HAVE KNOCK DOWN SPRAYERS FOR DUST CONTROL.
  3. RAW MATERIAL IS 80% AUTOMOBILE SCRAP, 20% WHITE SCRAP.
  4. OPERATING TIME, 8 HOURS A DAY, 5 DAYS A WEEK, 50 WEEKS A YEAR.



LEGEND

Drawn By SAH  
Checked By JTH  
Approved By JTH  
08/24/07

**GREAT LAKES**  
**ENGINEERING, Inc.**  
ENGINEERS and SURVEYORS

DRAWING FILE  
PROCESSFLOWDIA.

6084 Lute Road  
P.O. Box 1036  
Portage, IN 46368  
219.762.3559  
www.greatlakeseng.net

PROCESS FLOW DIAGRAM

SUMMIT, INC.  
GARY, IN

SHEET

1 of 1  
PROJECT  
WSC01

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

### Source Background and Description

Source Name:	Summit, Inc.
Source Location:	6901 West Chicago Avenue, Gary, Indiana 46406
County:	Lake
SIC Code:	5093
Operation Permit No.:	M089-25273-00529
Permit Reviewer:	Brian M Williams

On November 16, 2007, the Office of Air Quality (OAQ) had a notice published in the Gary Post Tribune and The Times newspapers in Lake County, Indiana, stating that Summit, Inc. had applied for a New Source Construction and Minor Source Operating Permit (MSOP) to construct and operate a new stationary scrap metal recycling plant located at 6901 West Chicago Avenue, Gary, Indiana 46406. The notice also stated that the OAQ proposed to issue a New Source Construction and MSOP 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.

### Comments and Responses

On December 14, 2007, the Gary Department of Environmental Affairs submitted comments to IDEM, OAQ on the draft New Source Construction and Minor Source Operating Permit (MSOP).

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. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

#### Comment 1:

Conditions D.1.4(a) and (b) require that the source operate the water spray system and cyclone at all times when the metal shredder (EU002) and z-box cleaning system (EU001) are operating. This will ensure compliance with the particulate emission limits found in Condition D.1.1. In Condition D.1.7, the source is required to shut down the z-box cleaning system in the event that cyclone failure has been observed. However, the permit does not require the source to shut down the water spray system in the event that a failure has been observed. As a result, please revise Section D.1 as follows:

#### **D.1.8 Water Spray System Failure Detection**

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**In the event that water spray system 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.**

**D.1.89 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain daily records of visible emission notations of stack S001. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit

**Response to Comment 1:**

IDEM, OAQ agrees with the recommended changes to the permit, since they will ensure that the metal shredder is able to comply with the particulate emission limits found in Condition D.1.1.

**Comment 2:**

Please add the following language to Section A.1:

...

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

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

Source Address:	6901 West Chicago Avenue, Gary, Indiana 46406
Mailing Address:	6901 West Chicago Avenue, Gary, Indiana 46406
General Source Phone Number:	219-944-9749
SIC Code:	5093
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone <b>and 1-hour ozone standards</b> Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

...

**Response to Comment 2:**

IDEM, OAQ agrees with the recommended change to the permit, since Lake County has been designated as nonattainment for the 1-hour ozone standard as indicated in the Technical Support Document.

Upon further review IDEM, OAQ has decided to make additional changes to the permit as listed below. The permit is revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

**Change 1:**

Condition C.6 in the Table of Contents is revised to include the 326 IAC 6.8-11 rule cite. The Table of Contents now corresponds with Condition C.6 found in Section C of the permit.

**C. SOURCE OPERATION CONDITIONS ..... 12**

- Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]
  - C.1 Permit Revocation [326 IAC 2-1.1-9]
  - C.2 Opacity [326 IAC 5-1]
  - C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Fugitive Dust Emissions [326 IAC 6.8-10] **[326 IAC 6.8-11]**
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

**Change 2:**

The Table of Contents is revised to indicate that the Annual Notification form is on page 22.

Annual Notification ..... **21 22**

**Change 3:**

Condition D.1.2 has been revised to indicate that PM10 emissions will be used as a surrogate for PM2.5 emissions, since Lake County has been designated as nonattainment for PM2.5.

...

**D.1.2 PM and PM10 [326 IAC 2-6.1]**

---

- (a) PM and PM10 emissions from the one (1) vehicle/metal shredder, identified as EU002, shall not exceed 0.0109 pounds per ton of metal shredded.
- (b) PM and PM10 emissions from the one (1) Z-box cleaning system, identified as EU001, shall not exceed 0.037pounds per ton of metal/fluff separated.

Compliance with these limits combined with the potential PM and PM10 emissions from all other emission units at this source will limit the source-wide total potential to emit of PM and PM10 to less than 100 tons per 12 consecutive month period and will render 326 IAC 2-7 (Part 70 Permits) not applicable. **PM10 emissions will be used as a surrogate for PM2.5 emissions.**

...

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Summit, Inc.</b>
<b>Source Location:</b>	<b>6901 West Chicago Avenue, Gary, Indiana 46406</b>
<b>County:</b>	<b>Lake</b>
<b>SIC Code:</b>	<b>5093</b>
<b>Application No.:</b>	<b>089-25273-00529</b>
<b>Reviewer:</b>	<b>Brian M Williams</b>

The Office of Air Quality (OAQ) has reviewed a MSOP application from Summit, Inc. relating to the construction and operation of a stationary scrap metal recycling plant.

**New Emission Units and Pollution Control Equipment**

The application includes information relating to the construction and operation of the following:

- (a) One (1) vehicle/metal shredder, identified as EU002, approved for construction in 2007, with a maximum capacity of 100 tons per hour, using three (3) water sprayer nozzles for particulate matter control;
- (b) One (1) Z-box cleaning system for metal/fluff separation, identified as EU001, approved for construction in 2007, with a maximum capacity of 100 tons per hour, using a cyclone for particulate matter control, exhausting to stack S001, with an exhaust flow rate of 15,000 dscfm;
- (c) One (1) conveyor system, identified as EU003, approved for construction in 2007, consisting of sixteen (16) conveyor transfer points, with a maximum capacity to transfer and convey 100 tons per hour, using water sprayers for particulate matter control;
- (d) Paved roads and parking lots with public access; and
- (e) Scrap metal storage piles.

**Unpermitted Emission Units and Pollution Control Equipment**

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

**Existing Approvals**

No previous air approvals have been issued to this source.

**Enforcement Issue**

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (°F)
S001	EU001	20.0	3.0	15,000	Ambient

### Recommendation

The staff recommends to the Commissioner that the application be approved as a MSOP. 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 September 11, 2007. Additional information was submitted by the source on October 9, 2007, October 10, 2007, and October 15, 2007.

### Emission Calculations

See Appendix A of this TSD for detailed emissions calculations (Appendix A, pages 1 through 5).

### Potential to Emit

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

Pollutant	Potential To Emit (tons/year)
PM	34.10
PM-10	23.65
SO <sub>2</sub>	0.00
NO <sub>x</sub>	0.00
VOC	0.00
CO	0.00

HAPs	Potential To Emit (tons/year)
Single HAP	Negligible
<b>TOTAL HAPs</b>	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM, PM-10, SO<sub>2</sub>, VOC, CO, and NO<sub>x</sub> are less than 100 tons per year and the potential to emit PM is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The PTE (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

## County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO <sub>2</sub>	Attainment
NO <sub>x</sub>	Attainment
8-Hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

(1) On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO<sub>x</sub> threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for nonattainment new source review. See the State Rule Applicability for the source section.

(2) VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for

violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.

- (c) Lake County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions  
Since this type of operation is not one of the 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

New Source PSD and Emission Offset 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	26.51*
PM-10	16.06*
SO <sub>2</sub>	0.00
NO <sub>x</sub>	0.00
VOC	0.00
CO	0.00
Worst Single HAP	Negligible
Combination HAPs	Negligible

\* Potential to Emit after Controls

- (a) This new source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This new source is not a Emission Offset major stationary source because no regulated nonattainment pollutant is emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

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

This is the first air approval issued to this source.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the registration for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the registration for this source.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-1.1-5 (Nonattainment NSR)**

Lake County has been designated as nonattainment for PM 2.5 in 70 FR 943, dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment regulated pollutant. Summit, Inc. has an unlimited potential to emit of PM10 below one hundred (100) tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-1.1-5 does not apply for PM2.5.

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

This source was constructed after the applicability date of August 7, 1977, however, it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(gg)(1) and the uncontrolled potential to emit of all attainment regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

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

Lake 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. The potential to emit of VOC or nitrogen oxides (NOx) of this source is less than 100 tons per year, therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

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

The requirements of 326 IAC 2-4.1 are not applicable to this source, since the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year.

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

This source is located in Lake County, but 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, it does not emit VOC or NO<sub>x</sub> into the ambient air at levels equal to or greater than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

### 326 IAC 2-6.1 (MSOP Permits)

For the one (1) Z-box cleaning system, identified as EU001, the source has elected to comply with alternative emission factors for PM and PM10. Additionally, there are no AP-42 emission factors for the one (1) vehicle/metal shredder, identified as EU002. As a result, PM and PM10 emission factors for metal shredding were obtained from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" (Appendix D, Table D-10.D.1 and Table D-10.F). Therefore, the source shall comply with the following PM and PM10 emission limits:

- (a) PM and PM10 emissions from the one (1) vehicle/metal shredder, identified as EU002, shall not exceed 0.0109 pounds per ton of metal shredded.
- (b) PM and PM10 emissions from the one (1) Z-box cleaning system, identified as EU001, shall not exceed 0.037 pounds per ton of metal/fluff separated.

Compliance with these limits combined with the potential PM and PM10 emissions from all other emission units at this source will limit the source-wide total potential to emit of PM and PM10 to less than 100 tons per 12 consecutive month period and will render 326 IAC 2-7 (Part 70 Permits) not applicable.

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

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

- (a) Opacity shall not exceed an average of twenty percent (20%) 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 Limitations)

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

### 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)

This source located in Lake County and it has the potential to emit fugitive particulate matter greater than five (5) tons per year. Therefore, this source is subject to the requirements of 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter). Pursuant to 326 IAC 6.8-10-3 (Particulate Matter Emission Limitations), the particulate matter emissions from source wide activities shall meet the following requirements when located in Lake County:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero percent (0%) frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero percent (0%) frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM<sub>10</sub> emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on October 15, 2007 (See Attachment A).

#### 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures)

This source located in Lake County, has the potential to emit PM10 greater than 10 tons/yr, and is subject to 326 IAC 6.8-10-1(a). Therefore, this source is subject to the requirements of 326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures). Pursuant to this rule, the source shall comply with 326 IAC 6.8-11-4 and 326 IAC 6.8-11-6.

#### 326 IAC 7-4.1 (Lake County Sulfur Dioxide Emission Limitations)

The requirements of 7-4.1 are not applicable to this source, since this source does not have the potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

#### 326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 are not applicable, since each of the emission units at this source do not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

#### 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

The requirements of 326 IAC 8-7 are not applicable, since this source does not have the potential to emit greater than one hundred (100) tons of VOCs per year and the source does not have coating facilities with the potential to emit greater than ten (10) tons of VOCs per year.

### **State Rule Applicability - Individual Facilities**

#### 326 IAC 6.8 (Particulate Matter Limitations for Lake County)

This scrap metal recycling plant is located in Lake County. This source is not specifically listed in

326 IAC 6.8-2 and does not have the unlimited potential to emit greater than one hundred (100) tons of particulate matter per year. However, this source has actual particulate matter emissions greater than ten (10) tons per year. Pursuant to 6.8-1-2(a), PM emissions from EU001, EU002, and EU003 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)) each.

The water sprayer nozzles shall be in operation at all times the metal shredder (EU002) is in operation, in order to comply with this limit.

The cyclone shall be in operation at all times the Z-box cleaning system (EU001) is in operation, in order to comply with this limit.

### Testing Requirements

In order to demonstrate compliance with 326 IAC 2-6.1 (MSOP), the Permittee shall perform PM and PM10 testing for the one (1) vehicle/metal shredder, identified as EU002 and the one (1) Z-box cleaning system, identified as EU001, within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup, utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

### Compliance Monitoring Requirements

The compliance monitoring requirements applicable to this source are as follows:

1. The Z-box cleaning system stack S001 has applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of stack S001 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 – Response to Excursions and Exceedances shall be considered a deviation from this permit.

## **Conclusion**

The construction and operation of this source shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit M089-25273-00529.

**Appendix A: Emission Calculations  
Metal/Fluff Shredding**

**Company Name: Summit, Inc.**  
**Address City IN Zip: 6901 West Chicago Avenue, Gary, IN 46406**  
**Permit No.: 089-25273-00529**  
**Reviewer: Brian Williams**  
**Date: September 11, 2007**

<b>Unlimited Potential to Emit PM/PM10</b>							
Process	Maximum Capacity (tons/hr)	PM/PM10 Emission Factor Before Control* (lbs/ton)	PM/PM10 PTE Before Control (lbs/hr)	PM/PM10 PTE Before Control (tons/yr)	PM/PM10 Emission Factor After Control <sup>1</sup> (lbs/ton)	PM/PM10 PTE After Control (lbs/hr)	PM/PM10 PTE After Control (tons/yr)
Metal Shredder (EU002)	100	0.0109	1.09	<b>4.77</b>	0.00257	0.257	<b>1.13</b>

**Notes:**

There are no AP-42 emission factors for metal shredding or fluff shredding.

Assume PM10 emissions = PM emissions.

Material is wetted by three water sprayer nozzles directly after the shredder drum.

\*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).

<sup>1</sup>The PM/PM10 emission factor, after water injection, is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.F.

**Methodology:**

PTE of PM/PM10 (lbs/hour) = Maximum Capacity (tons/hour) x Emission Factor (lbs/ton)

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

**Appendix A: Emission Calculations  
Z-Box Ferrous/ Non-Ferrous Metal Separator**

**Company Name: Summit, Inc.  
Address City IN Zip: 6901 West Chicago Avenue, Gary, IN 46406  
Permit No.: 089-25273-00529  
Reviewer: Brian Williams  
Date: September 11, 2007**

Unlimited Potential to Emit							
Process Description	Maximum Capacity (tons/hour)	PM/PM10 Emission Factor Before Control (lbs/ton)	PTE of PM/PM10 Before Control (lb/hr)	PTE of PM/PM10 Before Control (tons/yr)	PM/PM10 Emission Factor After Control (lbs/ton)	PTE of PM/PM10 After Control (lb/hr)	PTE of PM/PM10 After Control (tons/yr)
Z-Box Ferrous/ Non-Ferrous Metal Separator (EU001)	100	0.037	3.70	<b>16.21</b>	0.028	2.80	<b>12.26</b>

**METHODOLOGY**

PTE of PM/PM10 (lb/hr) = Maximum Capacity (tons/hour) x Emission Factor (lbs/ton)

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

**Notes:**

There are no AP-42 emission factors for metal shredding, fluff shredding or fluff separation.

Assume PM10 emissions = PM emissions.

PM/PM10 emissions from the Z-Box are controlled by a cyclone

PM/PM10 emissions factors provided by source.

The PTE determined above is higher than the PM/PM10 emission factors for Z-box separators as presented in Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D.11.A through D.11.E.

**Appendix A: Emission Calculations  
PM/PM10 Emissions from Conveyors**

**Company Name: Summit, Inc.  
Address City IN Zip: 6901 West Chicago Avenue, Gary, IN 46406  
Permit No.: 089-25273-00529  
Reviewer: Brian Williams  
Date: September 11, 2007**

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 (lb/hr)	PTE of PM10 (tons/year)
Conveyor Transfer Point - wet	16	100	1.40E-04	2.24E-01	<b>0.98</b>	4.60E-05	7.36E-02	<b>0.32</b>

**Notes:**

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).

**METHODOLOGY**

PTE of PM/PM10 (lbs/hr) = Number of Emission Points x Maximum Capacity (tons/hour) x Emission Factor (lbs/ton)

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

**Appendix A: Emission Calculations**  
**Fugitive Dust Emissions - Paved Roads**

Company Name: **Summit, Inc.**  
 Address City IN Zip: **6901 West Chicago Avenue, Gary, IN 46406**  
 Permit Number: **089-25273-00529**  
 Reviewer: **Brian Williams**  
 Date: **September 11, 2007**

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Maximum Weight Loaded (tons/vehicle)	Total Weight driven per day (ton/day)	Maximum miles (miles/vehicle/day)	Total miles (miles/day)	Total miles (miles/yr)
Semi	9.0	20.0	180.0	0.667	6.0	2190.0
Heavy Equipment	4.0	25.0	100.0	37.5	150.0	54,750.0
Pickup Truck	200.0	2.0	400.0	0.665	133.0	48,545.0
<b>Total</b>	<b>213.0</b>		<b>680.0</b>	<b>38.8</b>	<b>289.0</b>	<b>105,485.0</b>

Average Vehicle Weight = **3.2** tons/vehicle  
 Total Miles = **105,485.00** miles/yr

Unmitigated Emission Factor,  $E_f = k \cdot [(sL/2)^{0.65}] \cdot [(W/3)^{1.5}] - C$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	
where k =	0.082	0.016	lb/mi = particle size multiplier (AP-42 Table 13.2.1-4)
sL =	9.7	9.7	g/m <sup>2</sup> = mean silt loading of paved roads (AP-42 Table 13.2.1-4 Iron and Steel Production Plant Road)
C =	0.00047	0.00047	lb/mi = PM emission factor for 1980's vehicle fleet exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
W =	3.2	3.2	tons = average vehicle weight (provided by source)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E \cdot [1 - P/(4 \cdot 365)]$

Mitigated Emission Factor,  $E_{ext} = E \cdot [1 - P/(4 \cdot 365)]$   
 where P = **120** days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)

	PM	PM10	
Unmitigated Emission Factor, $E_f =$	0.25	0.05	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.23	0.04	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)
<b>Total Vehicle Traffic</b>	<b>13.23</b>	<b>2.56</b>	<b>12.14</b>	<b>2.35</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/vehicle)] \* [Maximum number of vehicles (vehicle/day)]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight (tons/vehicle) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum number of vehicles (vehicle/day)]  
 Total Miles (miles/year) = Total Miles (miles/day) \* 365 (days/year)  
 Unmitigated PTE (tons/yr) = (Total miles (miles/yr)) \* (Unmitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = (Total miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)

**Appendix A: Emission Calculations  
Summary of Emissions**

**Company Name: Summit, Inc.**  
**Address City IN Zip: 6901 West Chicago Avenue, Gary, IN 46406**  
**Permit No.: 089-25273-00529**  
**Reviewer: Brian Williams**  
**Date: September 11, 2007**

<b>Potential to Emit Before Controls (tons/yr)</b>							
<b>Process</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
Metal Shredder (EU002)	4.77	4.77	0.00	0.00	0.00	0.00	Negligible
Z-Box Ferrous/ Non-ferrous Metal Separator (EU001)	16.21	16.21	0.00	0.00	0.00	0.00	Negligible
Conveyors (EU003)	0.98	0.32	0.00	0.00	0.00	0.00	0.00
Paved Roads	12.14	2.35	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>34.10</b>	<b>23.65</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

<b>Potential to Emit After Controls (tons/yr)</b>							
<b>Process</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
Metal Shredder (EU002)	1.13	1.13	0.00	0.00	0.00	0.00	Negligible
Z-Box Ferrous/ Non-ferrous Metal Separator (EU001)	12.26	12.26	0.00	0.00	0.00	0.00	Negligible
Conveyors (EU003)	0.98	0.32	0.00	0.00	0.00	0.00	0.00
Paved Roads	12.14	2.35	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>26.51</b>	<b>16.06</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	Negligible