



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: April 25, 2008

RE: Intrametco Processing / 163-26173-00017

FROM: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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  
FN-REGIS.dot 1/2/08



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Mr. Jack MacLeod, Executive Vice President  
Intrametco Processing, Inc.  
P.O. Box 346  
Evansville, Indiana 47703

April 25, 2008

Re: Minor Source Operating Permit No. 163-18011-00071 transition to Registration No. 163-26173-00071

Dear Mr. MacLeod:

On September 7, 2007, Intrametco Processing, Inc. was issued a Minor Source Operating Permit No. 163-18011-00071 for a stationary Secondary Aluminum Processing Operating source, located at 1901 West Louisiana, Evansville, IN 47701. On February 26, 2008, Intrametco Processing, Inc. submitted an application for a Registration. Accordingly, Intrametco Processing, Inc., has been issued a Registration No. 163-26173-00071 that supersedes the Minor Source Operating Permit No. 163-18011-00071.

Pursuant to 326 IAC 2-1.1-9, any permit to construct or operate or any permit revision approval granted by the commissioner may be revoked for any cause that establishes in the judgment of the commissioner the fact that continuance of the permit or permit revision approval is not consistent with the purposes of 326 IAC 2. Since the source has been issued a Registration, the Minor Source Operating Permit is now superseded and is no longer needed.

The Minor Source Operating Permit No. 163-18011-00071 issued on September 7, 2007, is hereby revoked. Pursuant to IC 4-21.5-3-5(a) and (b), this revocation letter is effective in eighteen (18) days from the date of this letter.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

If there are any questions about this revocation, please contact Christina Lowry, at 317-234-5176 or at 1-800-451-6027 (ext 4-5176).

Sincerely,

Original Signed By:  
Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/ctl

cc: File - Vanderburgh County  
Vanderburgh County Health Department  
Air Compliance Section  
IDEM Southwest Regional Office  
Evansville Environmental Protection Agency  
Compliance Data Section  
Permits Administrative and Development  
Billing, Licensing and Training Section



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## REGISTRATION OFFICE OF AIR QUALITY EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY

**Intrametco Processing Inc.**  
**1901 West Louisiana**  
**Evansville, Indiana 47710**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 163-26173-00071	
Issued by: Original Signed By:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 25, 2008

## SECTION A

## SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Evansville Environmental Protection Agency. The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

### A.1 General Information

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The Registrant owns and operates a stationary secondary aluminum processing plant.

Source Address:	1901 West Louisiana, Evansville, Indiana 47710
Mailing Address:	P.O. Box 364 Evansville, Indiana 47703
General Source Phone Number:	(812) 423 - 5914
SIC Code:	3341
County Location:	Vanderburgh County
Source Location Status:	Attainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Registration

### 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) primary scrap shredder (identified as EU04), with a maximum capacity of 350 tons of aluminum scrap per hour. This unit was constructed in 1981. There is no process control equipment associated with this primary scrap aluminum shredder.
- (b) One (1) auxiliary scrap shredder (identified as EU05), with a maximum capacity of 1.75 tons of aluminum scrap per hour. This unit was installed in 1997. There is no process control equipment associated with this auxiliary scrap aluminum shredder.

## SECTION B

## GENERAL CONDITIONS

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

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Terms in this registration 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 Effective Date of Registration [IC 13-15-5-3]

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Pursuant to IC 13-15-5-3, this registration 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.

### B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (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 registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM and Evansville Environmental Protection Agency, the fact that continuance of this registration is not consistent with purposes of this article.

### B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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- (a) All terms and conditions of permits established prior to Registration No. 163-26173-00071 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 registration.

### B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

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Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality and the Evansville Environmental Protection Agency stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.

- (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

Evansville Environmental Protection Agency  
C.K. Newsome Community Center  
100 East Walnut Street, Suite 100  
Evansville, IN 47713

- (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 Evansville Environmental Protection Agency, on or before the date it is due.

**B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]**

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Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and the Evansville Environmental Protection Agency if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

**B.7 Registrations [326 IAC 2-5.1-2(i)]**

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Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

**C.1 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 registration:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.2 Fugitive Dust Emissions [326 IAC 6-4]**

The Registrant 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).

## SECTION D FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) primary scrap shredder (identified as EU04), with a maximum capacity of 3.50 tons of aluminum scrap per hour. This unit was constructed in 1981. There is no process control equipment associated with this primary scrap aluminum shredder.
- (b) One (1) auxiliary scrap shredder (identified as EU05), with a maximum capacity of 1.75 tons of aluminum scrap per hour. This unit was installed in 1997. There is no process control equipment associated with this auxiliary scrap aluminum shredder.

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

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

#### D.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the aluminum scrap shredders shall not exceed the pound per hour allowable emission rate as shown in the following table:

Emission Units	Process Weight Rate		Allowable Particulate Emission Rate (lbs/hour)
	(tons/hour)	(lbs/hour)	
One (1) Primary Aluminum Scrap Shredder	3.50	7,000	9.49
One (1) Auxiliary Scrap Shredder	1.75	3,500	5.97

The pound per hour allowable emission rate was calculated using the following equation:

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
Evansville Environmental Protection Agency**

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	Intrametco Processing Inc.
<b>Address:</b>	1901 West Louisiana
<b>City:</b>	Evansville, Indiana 47710
<b>Phone Number:</b>	(812) 423-5914
<b>Registration No.:</b>	163-26173-00071

I hereby certify that Intrametco Processing Inc. is :

still in operation.

I hereby certify that Intrametco Processing Inc. is :

no longer in operation.

in compliance with the requirements of Registration No. 163-26173-00071.

not in compliance with the requirements of Registration No. 163-26173-00071.

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

**Indiana Department of Environmental Management  
Office of Air Quality and  
Evansville Environmental  
Protection Agency**

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

**Source Description and Location**

**Source Name:** Intrametco Processing, Inc.  
**Source Location:** 1901 West Louisiana, Evansville, Indiana 47710  
**County:** Vanderburgh County  
**SIC Code:** 3341  
**Registration (or Exemption) No.:** 163- 26173- 00071  
**Permit Reviewer:** Christina Lowry

On February 26, 2008, the Office of Air Quality (OAQ) received an application from Intrametco Processing, Inc. related to the transition of a Minor Source Operating Permit to a Registration.

**Existing Approvals**

The source has been operating under a Minor Source Operating Permit No. 163-18011-00071, issued on September 7, 2007.

Due to this application, the source is transitioning from a Minor Source Operating Permit to a Registration.

**County Attainment Status**

The source is located in Vanderburgh County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.

(a) Ozone Standards

- (1) 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.

- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
  - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
  - (4) 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. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) Other Criteria Pollutants  
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for Sulfur Dioxide (SO<sub>2</sub>), Carbon Monoxide (CO), Nitrogen Oxide (NO<sub>x</sub>) and Lead (Pb). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### **Fugitive Emissions**

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.5 (Registrations) applicability.

### **Background and Description of Emission Units and Pollution Control Equipment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Intrametco Processing, Inc. on February 26, 2008, relating to the removal of all secondary aluminum processing operations at the facility. Due to the removal of all secondary aluminum processing operations at the facility, Intrametco Processing, Inc. has requested that its Minor Source Operating Permit transition to a Registration.

The source consists of the following remaining existing emission units:

- (a) One (1) primary scrap shredder (identified as EU04), with a maximum capacity of 3.50 tons of aluminum scrap per hour. This unit was constructed in 1981. There is no process control equipment associated with this primary scrap aluminum shredder.
- (b) One (1) auxiliary scrap shredder (identified as EU05), with a maximum capacity of 1.75 tons of aluminum scrap per hour. This unit was installed in 1997. There is no process control equipment associated with this auxiliary scrap aluminum shredder.

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Registration**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Primary Shredder EU04	8.74	8.74	-----	-----	-----	-----	-----	value or negl. (list HAP)
Auxiliary Shredder EU05	4.37	4.37	-----	-----	-----	-----	-----	-----
<b>Total PTE of Entire Source</b>	<b>13.1</b>	<b>13.1</b>	-----	-----	-----	-----	-----	-----
Exemptions Levels	5	5	10	10	5 or 10	25	2.5	1
Registration Levels	25	25	25	25	25	100	-	-

negl. = negligible  
 \* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of Particulate Matter (PM10) is within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A Registration will be issued.

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Aluminum Processing, 40 CFR 63, Subpart RRR (326 IAC 20-70), are not included in the permit, since this source is not a major source of HAPs.
- (b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR part 63) included in the permit.

### Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability Determination</b>
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- (a) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))  
Intrametco Processing, Inc. was constructed in the 1980s and is in one (1) of the twenty-eight (28) categories because this source uses secondary scrap from other sources. At the time the source was constructed, it was a minor source under PSD because the potential to emit of each criteria pollutant before controls was less than the PSD major source threshold of 100 tons per year. The Permittee installed a rotary dryer in 1984. After this modification, the potential to emit of each criteria pollutant was calculated to be below the 100 tons per year PSD threshold. The rotary dryer was de-commissioned from service effective August 11, 2004. Therefore, the source is a minor source under PSD and is not subject to the requirements of 326 IAC 2-2.
- (b) 326 IAC 2-3 (Emission Offset)  
Vanderburgh County has been designated as non-attainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM<sub>2.5</sub> Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM<sub>2.5</sub> major NSR regulations, states should assume that a major stationary source's PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions. IDEM will use the PM<sub>10</sub> nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM<sub>2.5</sub> NAAQS. A major source in a nonattainment area as a source that emits or has the potential to emit 100 tons per year of any regulated pollutant. Intrametco Processing, Inc. does not have potential to emit of PM<sub>10</sub> greater than 100 tons per year. Therefore, assuming that PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions, 326 IAC 2-3 does not apply.
- (c) 326 IAC 2-5.1-2 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (d) 326 IAC 2-5.5 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (e) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (f) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

(g) 326 IAC 5-1 (Opacity Limitations)  
 Intrametco Processing, Inc. is located in the City of Evansville in Vanderburgh County, Indiana. Therefore, 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:

- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability – Scrap Shredders**

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 Particulate emissions from the two (2) scrap shredders shall be limited as shown below:

Emission Unit	Maximum Throughput Rate		Particulate Emission Limit (lb/hour)
	(lb/hour)	(tons/hour)	
Primary Scrap Shredder	7,000	3.50	9.49
Auxiliary Scrap Shredder	3,500	1.75	5.97

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

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

Based on the potential to emit calculations (see Appendix A), the scrap shredders are in compliance with these limits and do not require the control equipment to be in operation in order to meet the particulate emission limitations.

(b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
 Sources or facilities located in the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne shall comply with the limitations in:

- (1) 326 IAC 6.5-2 through 326 IAC 6.5-10, if the source or facility is specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10; or
- (2) 326 IAC 6.5-1-2 if the source or facility is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, but has:
  - (a) the potential to emit one hundred (100) tons or more of particulate matter per year; or
  - (b) actual emissions of ten (10) tons or more of particulate matter per year.

Intrametco Processing, Inc. is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10 and does not have the potential to emit one hundred (100) tons or more of particulate matter per year or actual emissions of ten (10) tons or more of particulate matter per year. Therefore, 326 IAC 6.5 does not apply.

- (c) 326 IAC 6.5-8 (Vanderburgh County)  
Pursuant to 326 IAC 6.5-8-1(a), in addition to the emission limits contained in 326 IAC 6.5-1-2, sources and facilities located in Vanderburgh County and listed in 326 IAC 6.5-8-2 through 326 IAC 6.5-8-15 shall meet the specified emission limits.

Intrametco Processing, Inc. is not listed in 326 IAC 6.5-8-2 through 326 IAC 6.5-8-15. Therefore, Intrametco Processing, Inc. is not subject to 326 IAC 6.5-8.

- (d) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)  
The one (1) scrap shredder is not subject to the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) because these units do not have potential VOC emissions greater than twenty-five (25) tons per year.

### Conclusion and Recommendation

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 February 28, 2008.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 163-26173-00071. The staff recommends to the Commissioner that this Registration be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Christina Lowry at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emission Calculations**  
**PM/PM10 Emissions**  
**From Scrap Shredders (EU04 and EU05)**

**Company Name:** Intrametco Processing, Inc.  
**Address:** 1901 West Louisiana, Evansville, Indiana 47710  
**MSOP:** 163-26173-00071  
**Reviewer:** Christina Lowry  
**Date:** April 10, 2008

Emission Unit	Maximum Throughput (tons/hour)	* Emission Factor PM/PM10 (lb/ton)	PTE of PM/PM10		Particulate Emission Limit (lbs/hour)
			(lbs/hour)	(tons/year)	
Primary Shredder EU04	3.50	0.57	2.00	8.74	9.49
Auxiliary Shredder EU05	1.75	0.57	1.00	4.37	5.97
<b>Total</b>				<b>13.1</b>	

\* There are no PM/PM10 emission factors for a scrap shredder. Therefore, PM/PM10 emission factor is taken from a past certificate issued to the source by the Office of Evansville Environmental Protection Agency.

**METHODOLOGY**

PTE of PM/PM10 (lbs/hour) = Maximum Throughput (tons/hour) \* Emission Factor (lb/ton)

PTE of PM/PM10 (tons/year) = Maximum Throughput (tons/hour) \* Emission Factor (lb/ton) \* 8760 hours/year \* 1 ton/2000 lbs