



DATE: August 19, 2008

TO: Interested Parties / Applicant

RE: OmniSource Indianapolis, LLC / R097-26717-00580

FROM: Kyle Walker
Deputy Director, Department of Public Works

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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, Room 501, Indianapolis, IN 46204, **within eighteen (18) calendar days from 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw



August 19, 2008

Mr. Matt Cole
Plant Manager
OmniSource Indianapolis, LLC
2205 South Holt Road
Indianapolis, Indiana 46241

Certified Mail Number: 7008 0150 0003 5219 3417

Re: Registration Notice-Only Change
No. R097-26717-00580

Dear Mr. Cole:

Metal Dynamics, LLC was issued Registration No. R097-22690-00580 on June 26, 2006 for a stationary automobile shredding and ferrous scrap separation operation located at 2205 South Holt Road, Indianapolis, Indiana 46241. Registration Revision 097-23684-00580 was issued on December 5, 2006. On July 2, 2008, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and the City of Indianapolis Office of Environmental Services (OES) received an application from OmniSource Indianapolis, LLC requesting to change the operating name of the permittee on Registration R097-22690-00580 from Metal Dynamics, LLC to OmniSource Indianapolis, LLC. OmniSource Indianapolis, LLC also requested a decrease in the maximum capacity of the shredder, identified as emission unit 001, from 400 tons per hour to 300 tons per hour, a decrease in the overall number of conveyors, identified as emission unit 003, from eighteen (18) conveyors to thirteen (13) conveyors and other descriptive changes to emission unit 001, emission unit 002 and emission unit 003. Pursuant to 326 IAC 2-5.5-6(d)(2), the requested changes qualify as a Registration Notice Only Change because the changes are a minor administrative change in the name of the source and a minor administrative change in descriptive information concerning the source or emission units. The Registration Notice Only Change has been assigned the application tracking number 097-26717-00580. The Registration is hereby revised as stated in the attached Technical Support Document (TSD) for a Registration Notice Only Change. The source shall continue to operate according to 326 IAC 2-5.5. Please find enclosed the revised Registration.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark Caraher of my staff, at 317-327-2272, or mcaraher@indygov.org

Sincerely,

ORIGINAL SIGNED BY

Kyle Walker
Deputy Director
Department of Public Works

mbc

Attachment: Registration Notice Only Change
Technical Support Document (TSD)

cc: File
Air Compliance – Matt Mosier
IDEM, OAQ – Mindy Hahn
Marion County Health Department



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

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REGISTRATION

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**OmniSource Indianapolis, LLC
2205 South Holt Road
Indianapolis, Indiana 46241**

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. R097-22690-00580	
Issued by:	Issuance Date:
Original Signed By:	June 26, 2006
Felicia A. Robinson Administrator	

Registration Revision No. 097-23684-00580, issued on December 5, 2006.

Registration Notice Only Change No. 097-26717-00580	
Issued by:	Issuance Date:
Original Signed By:	August 19, 2008
Kyle Walker Deputy Director Department of Public Works	



Air Quality Hotline: 317-327-4AIR | knozone.com

**Department of Public Works
Office of Environmental Services**

2700 Belmont Avenue
Indianapolis, IN 46221

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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 Indianapolis Office of Environmental Services (OES). 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

The Registrant owns and operates a stationary automobile shredding and scrap separation operation.

Source Address:	2205 South Holt Road, Indianapolis, Indiana 46241
Mailing Address:	2205 South Holt Road, Indianapolis, Indiana 46241
General Source Phone Number:	(317) 381-5803
SIC Code:	5093
County Location:	Marion County
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) vehicle/metal shredder, identified as emission unit ID 001, approved to construct in 2006, with a maximum capacity of 300 tons per hour, using a water injection system as control and as an integral part of the shredding process. Emission unit ID 001 has no exhaust vent or exhaust stack.
- (b) One (1) Z-box cleaning system for metal/fluff separation, identified as emission unit ID 002, approved to construct in 2006, with a maximum capacity of 400 tons per hour, using a cyclone as control and as an integral part of the separation process, exhausting a nominal air flow of 7,000 acfm to stack/vent P002.
- (c) Thirteen (13) conveyors, identified as emission unit ID 003, approved to construct in 2006 with a maximum capacity to transfer and convey of 400 tons per hour.
- (d) The following VOC and/or HAP storage containers:
 - (1) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) The following activities each with potential uncontrolled emissions of equal to or less than one (1) pound per day of any regulated air pollutant:
 - (1) Brazing, soldering, or welding operations and associated equipment.
 - (2) Hand-held drilling and grinding equipment.
 - (3) Electrical resistance welding.
 - (4) Air compressors and pneumatically operated equipment, including hand tools.

- (5) Compressor or pump lubrication and seal oil systems.
- (6) Handling of solid steel, including coils and slabs, excluding scrap burning, scarfing, and charging into steel making furnaces and vessels.
- (7) Manual loading and unloading operations.
- (f) Paved roads and parking lots with public access.

SECTION B GENERAL CONDITIONS

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

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]

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]

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 OES, 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]

- (a) All terms and conditions of permits established prior to Registration No. R097-22690-00580 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)]

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 OES 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

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

- (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 OES on or before the date it is due.

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

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 OES 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)]

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).

C.3 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the revised plan submitted on September 21, 2006. The plan is included as Attachment A.

C.4 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

and

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

- (b) The Registrant shall notify IDEM, OAQ and OES of the actual test date at least fourteen (14 days) prior to the actual date. The notification submitted by the Registrant 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 OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES, if the Registrant 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.

C.5 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this Registration exceed the level specified in any condition of this Registration, the Registrant shall take appropriate response actions. The Registrant shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Registrant shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Registrant demonstrate to IDEM, OAQ that re-testing in one-hundred twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ and OES reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

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

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) vehicle/metal shredder, identified as emission unit ID 001, approved to construct in 2006, with a maximum capacity of 300 tons per hour, using a water injection system as control and as an integral part of the shredding process. Emission unit ID 001 has no exhaust vent or exhaust stack.
- (b) One (1) Z-box cleaning system for metal/fluff separation, identified as emission unit ID 002, approved to construct in 2006, with a maximum capacity of 400 tons per hour, using a cyclone as control and as an integral part of the separation process, exhausting a nominal air flow of 7,000 acfm to stack/vent P002.
- (c) Thirteen (13) conveyors, identified as emission unit ID 003, approved to construct in 2006 with a maximum capacity to transfer and convey of 400 tons per hour.
- (d) The following VOC and/or HAP storage containers:
 - (1) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) The following activities each with potential uncontrolled emissions of equal to or less than one (1) pound per day of any regulated air pollutant:
 - (1) Brazing, soldering, or welding operations and associated equipment.
 - (2) Hand-held drilling and grinding equipment.
 - (3) Electrical resistance welding.
 - (4) Air compressors and pneumatically operated equipment, including hand tools.
 - (5) Compressor or pump lubrication and seal oil systems.
 - (6) Handling of solid steel, including coils and slabs, excluding scrap burning, scarfing, and charging into steel making furnaces and vessels.
 - (7) Manual loading and unloading operations.
- (f) Paved roads and parking lots with public access.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

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

- (a) Pursuant to 326 IAC 6-3-2(e)(3) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) vehicle/metal shredder, identified as emission unit ID 001, the one (1) Z-box cleaning system for metal/fluff separation, identified as emission unit ID 002, and each of the thirteen (13) conveyors, identified as emission unit ID 003, shall each not exceed the values shown in the following table when operating at the process weight shown:

Emission Unit	Process Weight (tons per hour)	326 IAC 6-3-2 Allowable Emissions (pounds per hour)
Vehicle/metal shredder (001)	300	63.00
Z-box cleaning system for metal/fluff separation (002)	400	66.31
Each of the thirteen (13) conveyors (003)	400	66.31

The allowable particulate emission rate was calculated as follows:
Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.2 Particulate Matter (PM)

The water injection system for the vehicle/metal shredder, identified as emission unit ID 001, and the cyclone for the Z-box cleaning system for metal/fluff separation, identified as emission unit ID 002 shall operate at all times when the vehicle/metal shredder process and the Z-box cleaning system for metal/fluff separation process are in operation.

D.1.3 Testing Requirements

Within sixty (60) days after achieving the maximum production rate but no later than one hundred eighty (180) days after startup of emission unit ID 002, the Permittee shall demonstrate compliance with Condition D.1.1 by conducting a stack test for PM emissions from emission unit ID 002, utilizing methods as approved by IDEM, OAQ and OES.

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

**REGISTRATION
ANNUAL NOTIFICATION**

Year: _____

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).

Company Name:	OmniSource Indianapolis, LLC
Address:	2205 South Holt Road
City:	Indianapolis, Indiana 46241
Phone Number:	(317) 381-5803
Registration No.:	R097-22690-00580

I hereby certify that OmniSource Indianapolis, LLC is :

still in operation.

no longer in operation.

I hereby certify that OmniSource Indianapolis, LLC is :

in compliance with the requirements of Registration No. R097-22690-00580.

not in compliance with the requirements of Registration No. R097-22690-00580.

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

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.

Noncompliance:

ATTACHMENT A

(fugitive dust control plan
pursuant to 326 IAC 6-5-1(b))

FUGITIVE DUST CONTROL PLAN

(1) Name and address of the source.

**OmniSource Indianapolis, LLC
2205 South Holt Road
Indianapolis, Indiana 46241**

(2) Name and address of the owner or operator responsible for the execution of the control plan.

**OmniSource Indianapolis, LLC
2205 South Holt Road
Indianapolis, Indiana 46241**

(3) Identification of all processes, operations, and areas which have the potential to emit fugitive particulate matter in accordance with 326 IAC 6-5-4.

**Paved Roads
Parking Lot
Process Area
Conveying
Truck transportation of shredder fluff**

(4) A map of the source showing aggregate pile areas, access areas around the aggregate pile, unpaved roads, paved roads, parking lots and location of conveyor and transfer points, etc.

The attached map shows the pattern of truck traffic and the parking lots at the site. All roads and parking lots are paved.

The conveyors and material handling areas are indicated on the attached map. Conveyors associated with auto shredder residue and auto fluff conveying serve to transport thoroughly dampened product. Transfer points and material handling associated with unloading and transport of thoroughly dampened product will utilize minimized drop heights.

None of the storage areas are sources of dust or fugitive particulate matter.

(5) The number and mix of vehicular activity occurring on paved roads, unpaved roads, and parking lots.

The parking area is reserved for dual axle automobiles only. The truck traffic is associated with deliveries and shipping from semi-trucks and is expected to equal less than 2000 vehicle miles per year with an average vehicle weight of less than 67 tons.

(6) Type and quantity of material handled.

The material handled will be auto bodies and mixed scrap. The capacity of the shredder is 300 tons per hour and the capacity of the remainder of the process is 400 tons per hour.

(7) Equipment used to maintain aggregate piles.

No aggregate piles are associated with this source.

(8) A description of the measures to be implemented to control fugitive particulate matter emissions resulting from emission points identified in subdivision (3).

OmniSource Indianapolis, LLC will employ paved roads and parking lots and utilizes conveyors to transfer and handle thoroughly dampened material. OmniSource Indianapolis, LLC uses sweepers, skid steer loaders, wheel loaders, or other equipment to clean all paved surfaces, as needed. Water or dust suppression will be used as needed. Trucks hauling shredder fluff will be tarped.

(9) A specification of the dust suppressant material, such as oil or chemical including the estimated frequency of application rates and concentrations.

OmniSource Indianapolis, LLC may use water, or IDEM approved chemical or oil-based dust suppressant as needed. Since OmniSource Indianapolis, LLC provides a vegetative boundary and does not have fugitive emissions from storage piles, and roads and parking lots are paved, and the yard surface is cleaned as needed, it is expected there will be little need for application of dust suppressants. However, OmniSource Indianapolis, LLC may use dust suppressants when necessary to prevent fugitive dust. The type of chemical stabilization, application rate, and concentration to be used is based on the type of surface, temperature, frequency of disturbances, wind conditions, and length of required stabilization. The list of chemical stabilization product types that may be used at OmniSource Indianapolis, LLC include, but are not be limited to, the following: Fiber-based dust palliatives, Calcium Chloride, Coherex, Magnesium Chloride, Lignosulfonate, Petroleum resin, or Polymers.

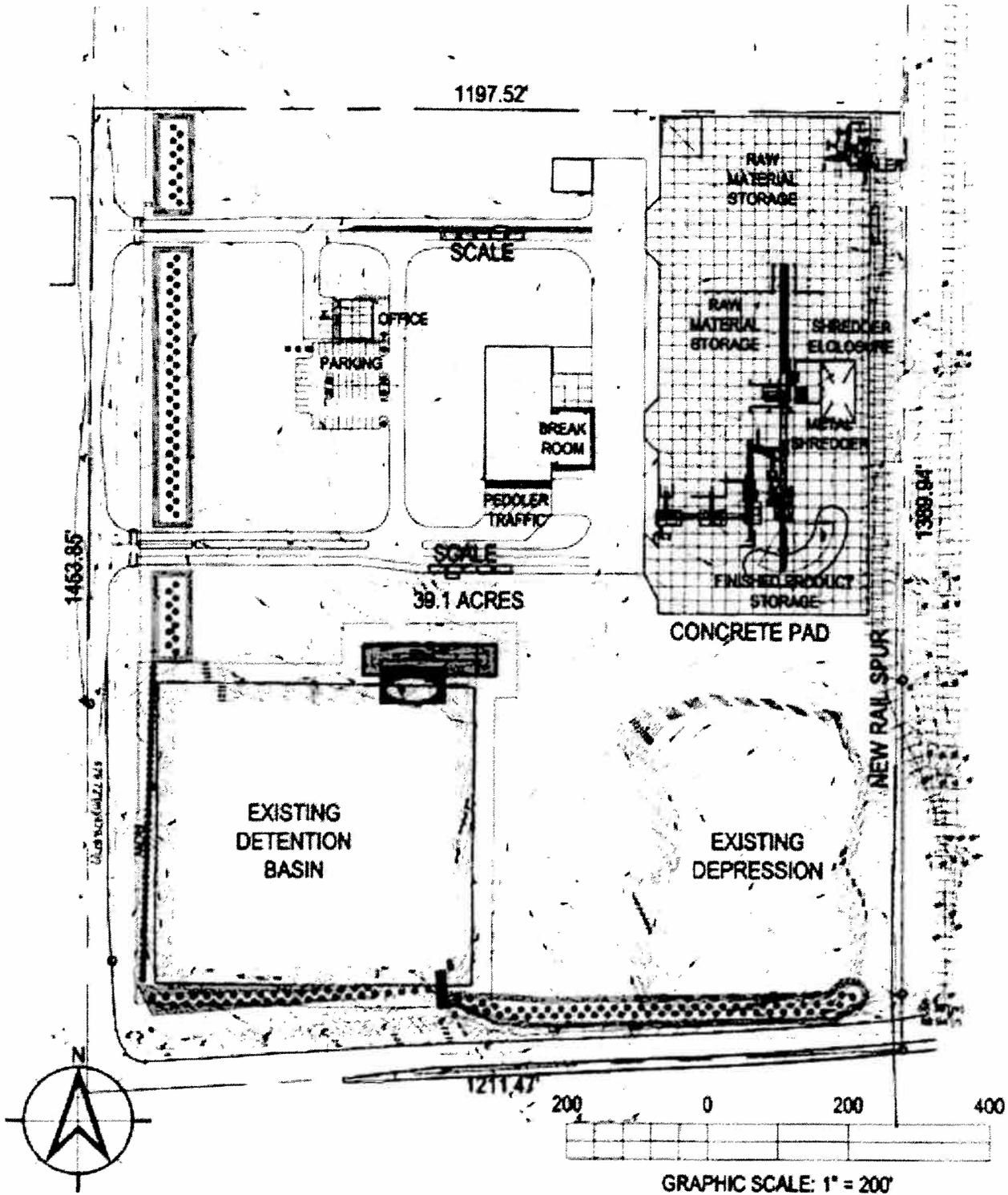
(10) A specification of the particulate matter collection equipment used as a fugitive particulate matter emission control measure.

Sweepers, skid steer loaders, wheel loaders, or other equipment are employed as needed to clean all paved surfaces.

(11) A schedule of compliance with the provisions of the control plan. Such schedule shall specify the amount of time the source requires to award any necessary contracts, commence and complete construction, installation, or modification of the fugitive particulate matter emission control measures.

The source will maintain compliance with the control plan at all times during operation of fugitive emission processes.

Records shall be kept and maintained which document all control measures and activities to be implemented in accordance with the approved control plan. Said records shall be available upon the request of the commissioner, and shall be retained for three (3) years.



THESE DRAWINGS ARE GIVEN IN CONFIDENCE AND SHALL BE USED ONLY IN PURSUANCE TO THE AGREEMENT WITH WILSON ENGINEERING, P.C. NO STATE USE OR REPLICATION MAY BE MADE WITHOUT THE PRIOR WRITTEN CONSENT OF WILSON ENGINEERING, P.C. ALL OTHER COPYRIGHT AND OTHER LAW RIGHTS ARE HEREBY SPECIFICALLY RESERVED.

<p>OMNISOURCE INDIANAPOLIS, LLC SOUTH HOLT ROAD INDIANAPOLIS, INDIANA 46241</p>	<p>Drawn By Job Checked By BEM Project No 05881 Date 07/05/04</p>	 <p>OmniSource Engineering</p>	<p>2000 Clark Street Road Suite 200 Phoenix, Arizona 85009 Phone (602) 867-8707 Fax (602) 867-7368</p> <p>Sheet Number: X1</p>
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SITE PLAN

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Technical Support Document (TSD) for a
Registration Notice Only Change**

Source Description and Location

Source Name: OmniSource Indianapolis, LLC
Source Location: 2205 South Holt Road, Indianapolis, Indiana 46241
County: Marion
SIC Code: 5093
Registration No.: R097-22690-00580
Registration Issuance Date: June 26, 2006
Registration Notice Only Change No.: 097-26717-00580
Permit Reviewer: M. Caraher

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration R097-22690-00580 issued on June 26, 2006.
- (b) Registration Revision 097-23684-00580 issued on December 5, 2006.

See Notice Only Changes section of this Technical Support Document for all conditions from previous approvals that are either revised by this Registration Notice Only Change or were not incorporated into this Registration Notice Only Change.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM10	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion 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 effective 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 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.
 - (3) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability Determination section.
- (c) **Other Criteria Pollutants**
Marion County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, NO₂ and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

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.

Enforcement Issues

There are no pending enforcement actions related to this Notice Only Change or to this source.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed Notice Only Change, after consideration of all enforceable limits established in the effective permits:

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAP	Highest Single HAP
Shredder (001)	4.50	4.50	4.50	Negl.	Negl.	0.89	Negl.	2.53	0.70
Fluff Separation (002)	7.88	7.88	7.88	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.
Conveyors (003)	9.43	3.27	3.27	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.
Fugitive Emissions (Paved Roads)	3.14	0.18	0.18	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.
Total PTE of Entire Source	24.95	15.83	15.83	Negl.	Negl.	0.89	Negl.	2.53	0.70
Exemption Levels	5	5	-	10	10	5 or 10	25	25	10
Registration Levels	25	25	-	25	25	25	100	25	10

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".

Emission Calculations

See Appendix A for emission calculations regarding the decrease in the maximum capacity for the vehicle/metal shredder, identified as emission unit 001, and the decrease in the overall number of conveyors, identified as emission unit 003.

Description of the Notice Only Changes

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed an application from Metal Dynamics, LLC submitted on July 2, 2008 relating to Notice Only Changes to an existing Registration.

The Registration is being modified through a Registration Notice Only Change pursuant to 326 IAC 2-5.5-6(d)(2). The Notice Only Change will decrease the maximum capacity of the shredder, identified as emission unit 001, from 400 tons per hour to 300 tons per hour, will decrease the overall number of conveyors, identified as emission unit 003, from eighteen (18) conveyors to thirteen (13) conveyors and will change the operating name of this source from Metal Dynamics, LLC to OmniSource Indianapolis, LLC. Therefore, pursuant to 326 IAC 2-5.5-6(d)(2), the modification qualifies as a Registration Notice Only Change because the changes qualify as a minor administrative change in the name of the source and a minor administrative change in descriptive information concerning the source or emission units. The Registration Notice Only Change has been assigned the application tracking number 097-26717-00580.

Permit Level Determination – Registration Notice Only Change

The following table is used to determine the appropriate permit level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the proposed revision, with the revised potential to emit in strikethrough and the new potential to emit in bold.

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAP	Highest Single HAP
Shredder (001)	3.38 4.50	3.38 4.50	3.38	Negl.	Negl.	0.89	Negl.	1.90 2.53	0.53 0.70
Fluff Separation (002)	7.88	7.88	7.88	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.
Conveyors (003)	8.20 9.43	2.87 3.27	2.87	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.
Fugitive Emissions (Paved Roads)	3.14	0.18	0.18	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.
Total PTE of the Entire Source	22.60 24.95	14.31 15.83	14.31	Negl.	Negl.	0.89	Negl.	1.90 2.53	0.53 0.70

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".

The Registration is being modified through a Registration Notice Only Change pursuant to 326 IAC 2-5.5-6(d)(2) because the changes qualify as a minor administrative change in the name of the source and a minor administrative change in descriptive information concerning the source or emission units.

PTE of the Entire Source After Issuance of the Registration Notice Only Change

The table below summarizes the potential to emit of the entire source after issuance of this Registration Notice Only Change, reflecting all limits, of the emission units.

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of Registration Notice Only Change (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAP	Highest Single HAP
Shredder (001)	3.38	3.38	3.38	Negl.	Negl.	0.89	Negl.	1.90	0.53
Fluff Separation (002)	7.88	7.88	7.88	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.
Conveyors (003)	8.20	2.87	2.87	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.
Fugitive Emissions (Paved Roads)	3.14	0.18	0.18	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.
Total PTE of the Entire Source	22.60	14.31	14.31	Negl.	Negl.	0.89	Negl.	1.90	0.53

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".

- (a) This Notice Only Change will not change the registration status of the source, because the uncontrolled/unlimited potential to emit of all criteria pollutants from the entire source will still be within the ranges listed in 326 IAC 2-5.5-1(b)(1) and the PTE of all other regulated criteria pollutants will still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5

(Registrations).

- (b) This Notice Only Change will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAP will still be 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 2-7.

Federal Rule Applicability Determination

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

State Rule Applicability Determination – Individual Facilities

326 IAC 2-1.1-5 (Non-attainment New Source Review)

Marion County County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. This existing source is not a major stationary source, under Non-attainment New Source Review (326 IAC 2-1.1-5), because the potential to emit of PM2.5 and SO₂ are each less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Non-attainment New Source Review requirements do not apply.

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

Pursuant to 326 IAC 6-3-2(e)(3) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) vehicle/metal shredder, identified as emission unit ID 001, the one (1) Z-box cleaning system for metal/fluff separation, identified as emission unit ID 002, and each of the thirteen (13) conveyors, identified as emission unit ID 003, shall each not exceed the values shown in the following table when operating at the process weight shown:

Emission Unit	Process Weight (tons per hour)	326 IAC 6-3-2 Allowable Emissions (pounds per hour)
Vehicle/metal shredder (001)	300	63.00
Z-box cleaning system for metal/fluff separation (002)	400	66.31
Each of the thirteen (13) conveyors (003)	400	66.31

The allowable particulate emission rate was calculated as follows:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

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

The water injection system for the vehicle/metal shredder, identified as Emission Unit ID 001, and the cyclone for the Z-box cleaning system for metal/fluff separation, identified as Emission Unit ID 002 shall operate at all times when the vehicle/metal shredder process and the Z-box cleaning system for metal/fluff separation process are in operation.

Testing Requirements

In order to verify compliance with the applicable particulate emission limit in 326 IAC 6-3-2(e)(3) (Particulate Emission Limitations for Manufacturing Processes) for the Z-box metal/fluff separation process, identified as Emission Unit ID 002, compliance stack testing shall be performed on Emission Unit ID 002. Within sixty (60) days after achieving the maximum production rate but no later than one hundred and eighty (180) days after startup of Emission Unit ID 002, the Registrant shall demonstrate compliance with 326 IAC 6-3-2(e)(3) by conducting a stack test for PM emissions from Emission Unit ID 002, utilizing methods as approved by IDEM, OAQ and OES.

Notice Only Changes

Metal Dynamics, LLC, was issued Registration 097-22690-00580 on June 26, 2006. The Registration was revised by Registration Revision 097-23684-00580 issued on December 5, 2006. The changes listed below have been made to Registration Revision 097-23684-00580 by this Registration Notice Only Change 097-26717-00580. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Change 1

Per OmniSource Indianapolis, LLC request, the name of the Registrant has been changed throughout the Registration as follows:

~~Metal Dynamics, LLC~~ **OmniSource Indianapolis, LLC**

Change 2

The format of the Registration is being updated by IDEM, OAQ and OES from a letter format to a format of Section A, B, C, and D. Therefore, emission unit descriptions are now contained in Section A (Source Summary) and Section D (Operation Conditions) with existing applicable requirements now contained in Section B (General Conditions), Section C (Source Operation Conditions) and Section D.

Per OmniSource Indianapolis, LLC request, the descriptions of emission unit 001, emission unit 002 and emission unit 003 are inserted in Section A.2 and Section D.1 of the Registration and are changed as follows:

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

- (a) One (1) vehicle/metal shredder, ~~model number 130 Heavy~~, identified as emission unit ID 001, **approved to construct in 2006**, ~~to be constructed in 2007~~, with a maximum capacity of **300** ~~400~~ tons per hour, using a **water injection system** ~~Smart Water Injection System~~ as control and as an integral part of the shredding process. Emission unit ID 001 has no exhaust vent or exhaust stack.
- (b) One (1) Z-box cleaning system for metal/fluff separation, identified as emission unit ID 002, **approved to construct in 2006**, ~~to be constructed in 2007~~, with a maximum capacity of 400 tons per hour, using a cyclone as control and as an integral part of the separation process, exhausting **a nominal air flow of 7,000 acfm** to stack/vent P002.
- (c) **Thirteen (13)** ~~Eighteen (18)~~ conveyors, identified as emission unit ID 003, **approved to construct in 2006**, ~~to be constructed in 2007~~, with a maximum capacity to transfer and convey **of 400** tons per hour.

Change 3

The shredder capacity for emission unit 001 is being changed from 400 tons per hour to 300 tons per hour. There is no change in the conveying capacity because the conveyors can process stock piled material at a rate higher than the shredding capacity. The total number of conveyors, identified as emission unit 003, is changed from eighteen (18) conveyors to thirteen (13) conveyors. Because the maximum capacity of the shredder decreased, the allowable PM emissions, pursuant to 326 IAC 6-3-2(e)(3), have been changed and are inserted as Condition D.1.1 as follows:

Pursuant to 326 IAC 6-3-2(e)(3) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) vehicle/metal shredder, identified as emission unit ID 001, the one (1) Z-box cleaning system for metal/fluff separation, identified as emission unit ID 002, and each of the **thirteen (13)** ~~eighteen (18)~~ conveyors, identified as emission unit ID 003, shall each not exceed the values shown in the following table when operating at the process weight shown:

Emission Unit	Process Weight (tons per hour)	326 IAC 6-3-2 Allowable Emissions (pounds per hour)
Vehicle/metal shredder (001)	300 400	63.00 66.31
Z-box cleaning system for metal/fluff separation (002)	400	66.31
Each of the thirteen (13) eighteen (18) conveyors (003)	400	66.31

The allowable particulate emission rate was calculated **as follows with the following equation:** Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

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

The **water injection system** ~~Smart Water Injection System~~ for the vehicle/metal shredder, identified as emission unit ID 001, and the cyclone for the Z-box cleaning system for metal/fluff separation, identified as emission unit ID 002 shall operate at all times when the vehicle/metal shredder process and the Z-box cleaning system for metal/fluff separation process are in operation.

Conclusion

The construction and operation of this automobile shredding and scrap separation source shall be subject to the conditions of the Registration Notice Only Change 097-26717-00580.

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

Company Name: OmniSource Indianapolis, LLC
Address City IN Zip: 2205 South Holt Road, Indianapolis, Indiana 46241
Registration No.: R097-22690-00580
Registration Issuance Date: June 26, 2006
Registration Notice Only Change No.: 097-26717-00580
Reviewer: M. Caraher
Date: August 15, 2008

Emission Unit ID	Maximum Capacity (tons/hour)	PM/PM10 Emission Factor (lbs/ton)	PM/PM10 PTE (lbs/hour)	PM/PM10 PTE (tons/yr)
001	300	0.00257	0.77	3.38

Notes:

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

Assume PM10 emissions = PM emissions.

All material input to the vehicle/metal shredder is wetted in the shredder with the Smart Water Injection System.

The emission factor submitted by Metal Dynamics was assumed to be the emission rate prior to the use of the Smart Water Injection System which Metal Dynamics claimed as integral to the operation of the vehicle/metal shredder. Therefore, the potential to emit must be determined after the use of the Smart Water Injection System.

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
Conveyors**

Company Name: OmniSource Indianapolis, LLC
Address City IN Zip: 2205 South Holt Road, Indianapolis, Indiana 46241
Registration No.: R097-22690-00580
Registration Issuance Date: June 26, 2006
Registration Notice Only Change No.: 097-26717-00580
Reviewer: M. Caraher
Date: August 15, 2008

Emission Unit ID	number of conveyors	Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PM Emissions (tons/year)	PM Emissions each conveyor (lbs/hr)	PM10 Emission Factor (lbs/ton)	PM10 Emissions (tons/yr)
003 (dry)	1	400	0.003	5.26	1.20	0.0011	1.93
003 (wet)	12	400	0.00014	2.94	0.06	4.5E-05	0.95
Total Emissions				8.20			2.87

Notes:

Input conveyor is dry. All material input to the vehicle/metal shredder is wetted in the shredder with the Smart Water Injection System. The PM/PM10 emission factors are from AP-42 Chapter 11.19, Table 11.19.2-2. Based on uncontrolled PM emissions in lbs/hr for each conveyor, control equipment is not needed to specifically comply with 326 IAC 6-3-2.

Methodology:

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

**Appendix A: Emission Calculations
HAP Emissions**

Company Name: OmniSource Indianapolis, LLC
Address City IN Zip: 2205 South Holt Road, Indianapolis, Indiana 46241
Registration No.: R097-22690-00580
Registration Issuance Date: June 26, 2006
Registration Notice Only Change No.: 097-26717-00580
Reviewer: M. Caraher
Date: August 15, 2008

Process rate: 300
 (tons/hour)

	HAP ?	Emission Factor (lbs/ton)	Emissions (lbs/hr)	Emissions (tons/yr)
Methylene Chloride	Yes	6.00E-05	1.80E-02	7.88E-02
1,1 Dichloroethene	No	1.33E-05	3.99E-03	1.75E-02
MEK	Yes	5.33E-06	1.60E-03	7.00E-03
1,1,1 Trichloroethane	Yes	2.00E-04	6.00E-02	2.63E-01
Benzene	Yes	4.00E-04	1.20E-01	5.26E-01
Tetrachloroethene	Yes	2.67E-06	8.01E-04	3.51E-03
Trichloroethene	Yes	6.67E-05	2.00E-02	8.76E-02
Toluene	Yes	3.33E-04	9.99E-02	4.38E-01
Ethylbenzene	Yes	6.67E-05	2.00E-02	8.76E-02
Styrene	Yes	1.33E-05	3.99E-03	1.75E-02
o-xylene	Yes	6.67E-05	2.00E-02	8.76E-02
m, p, - xylene	Yes	1.33E-04	3.99E-02	1.75E-01
Total VOC				1.79E+00
Total PCB	Yes	8.73E-05	2.62E-02	1.15E-01
Cadmium	Yes	1.16E-06	3.48E-04	1.52E-03
Chromium	Yes	1.28E-06	3.84E-04	1.68E-03
Lead	Yes	7.89E-06	2.37E-03	1.04E-02
Total Metals				1.36E-02
Highest Single HAP - Benzene				5.26E-01
Combined HAPs				1.90E+00

Notes:

Emission factors from Table D-11.F "Title V Applicability Workbook" Institute of Scrap Recycling Industries, Inc. (Jan 1996)

Methodology:

Emissions (lbs/hr) = Process rate (tons/hr) x Emission Factor (lbs/ton)

Emissions (tons/yr) = Process rate (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x ton/2000lbs

**Appendix A: Emission Calculations
Summary of PTE in Tons per Year**

Company Name: OmniSource Indianapolis, LLC
Address City IN Zip: 2205 South Holt Road, Indianapolis, Indiana 46241
Registration No.: R097-22690-00580
Registration Issuance Date: June 26, 2006
Registration Notice Only Change No.: 097-26717-00580
Reviewer: M. Caraher
Date: August 15, 2008

Emission Unit	Pollutant						Highest Single HAP (benzene)	Combined HAPs
	PM	PM10	SO ₂	NO _x	VOC	CO		
001(Shredder)	3.38	3.38	0.00	0.00	0.89	0.00	see total	see total
002 (Fluff Separation)	7.88	7.88	0.00	0.00	0.00	0.00	below	below
003 (Conveyors)	8.20	2.87	NA	NA	NA	NA	NA	NA
Paved Roads	3.14	0.18	NA	NA	NA	NA	NA	NA
TOTAL PTE	22.60	14.31	0.00	0.00	0.89	0.00	0.53	1.90
TOTAL PSD/EO PTE	19.46	14.13	0.00	0.00	0.89	0.00		

Notes:

Total PSD/EO PTE does not include fugitive emissions