



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

TO: Interested Parties / Applicant

DATE: November 10, 2011

RE: 360 Degree Metal Recycling, Inc / 141-30660-00577

FROM: Matthew Stuckey, 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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New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**360 Degree Metal Recycling, Inc.
54400 Smilax Rd.
New Carlisle, Indiana 46552**

(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.: M141-30660-00577	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 10, 2011 Expiration Date: November 10, 2016

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary vehicle and metal scrap shredding facility.

Source Address:	54400 Smilax Rd., New Carlisle, Indiana 46552
General Source Phone Number:	(269) 876-7009
SIC Code:	5093 (Scrap and Waste Material)
County Location:	St. Joseph
Source Location Status:	Attainment for all 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

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

- (a) One (1) 4000 Hp DC electric vehicle/metal shredder, identified as EU-001, approved for construction in 2011, with a maximum throughput capacity of 90 tons/hr, using an integral smart water injection system as fire/explosion suppression and particulate control, and exhausting to the ambient atmosphere.
- (b) One (1) conveyor system, identified as EU-002, approved for construction in 2011, with a maximum throughput capacity of 90 tons/hr, consisting of:
 - (1) Six (6) wet conveyors; and
 - (2) One (1) dry conveyor.
- (c) Paved roadways and parking lots with public access.

SECTION B GENERAL CONDITIONS

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

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)]

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]

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)]

- (a) This permit, M141-30660-00577, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.7 Severability

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

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

B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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. Upon request, the Permittee shall also furnish to IDEM, OAQ 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 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (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 on or before the date it is due.

B.11 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) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

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

- (a) All terms and conditions of permits established prior to M141-30660-00577 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.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) 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 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 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][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, 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.18 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete 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.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (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.20 Credible Evidence [326 IAC 1-1-6]

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

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

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

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to 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, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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.

- (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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ 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]

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]

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 Instrument Specifications [326 IAC 2-1.1-11]

- (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.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.13 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 permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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.15 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, 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) 4000 Hp DC electric vehicle/metal shredder, identified as EU-001, approved for construction in 2011, with a maximum throughput capacity of 90 tons/hr, using an integral smart water injection system as fire/explosion suppression and particulate control, and exhausting to the ambient atmosphere.
- (b) One (1) conveyor system, identified as EU-002, approved for construction in 2011, with a maximum throughput capacity of 90 tons/hr, consisting of:
 - (1) Six (6) wet conveyors; and
 - (2) One (1) dry conveyor.

(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 Best Available Control Technology (BACT) Avoidance Limit - VOC [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (a) The material throughput to the vehicle/metal shredder (EU-001) shall not exceed 199,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) VOC emissions from the vehicle/metal shredder (EU-001) shall not exceed 0.25 lbs/ton of material throughput.
- (c) The Permittee shall drain and remove (to the extent possible) all fluids from vehicles, appliances, industrial machinery, and other metal scrap received by the Permittee prior to shredding; or the Permittee shall document that inspections have been performed to confirm the non-existence of fluids. Fluids shall include, but are not limited to, gasoline, motor oil, antifreeze, transmission oil, brake oil, power steering fluid, hydraulic fluid, and differential fluid.

Compliance with these limits shall limit the potential to emit of VOC from the vehicle/metal shredder (EU-001) to less than twenty five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the vehicle/metal shredder (EU-001) shall not exceed 50.23 pounds per hour when operating at a process weight rate of 90 tons per hour.

The pound per hour limitation was calculated with the following equation:

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the vehicle/metal shredder (EU-001) and the smart water injection system. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to ensure compliance with Condition D.1.2, the integral smart water injection system shall be in operation and control emissions from the vehicle/metal shredder (EU-001) at all times that the vehicle/metal shredder is in operation.

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

D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain records of the material throughput to the vehicle/metal shredder each month and each compliance period.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1(a) shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	360 Degree Metal Recycling, Inc.
Address:	54400 Smilax Rd.
City:	New Carlisle, Indiana 46552
Phone #:	(269) 876-7009
MSOP #:	M141-30660-00577

I hereby certify that 360 Degree Metal Recycling, Inc. is: still in operation.
 no longer in operation.

I hereby certify that 360 Degree Metal Recycling, Inc. is: in compliance with the requirements of MSOP M141-30660-00577.
 not in compliance with the requirements of MSOP M141-30660-00577.

Authorized Individual (typed):
Title:
Signature:
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:

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

MSOP Quarterly Report

Source Name: 360 Degree Metal Recycling, Inc.
 Source Address: 54400 Smilax Rd., New Carlisle, IN 46552
 MSOP Permit No.: M141-30660-00577
 Facility: Vehicle/Metal Shredder (EU-001)
 Parameter: Material Throughput
 Limit: The material throughput to the vehicle/metal shredder (EU-001) shall not exceed 199,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Material Throughput (tons)	Material Throughput (tons)	Material Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
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:

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

360 Degree Metal Recycling, Inc.
54400 Smilax Rd.
New Carlisle, Indiana 46552

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 360 Degree Metal Recycling, Inc. 54400 Smilax Rd., New Carlisle, Indiana 46552, completed construction of the vehicle and metal scrap shredding facility on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 24, 2011 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M141-30660-00577, Plant ID No. 141-00577 issued on _____.

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)

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

Addendum to the Technical Support Document (ATSD) for a
Minor Source Operating Permit (MSOP)

Source Background and Description
--

Source Name:	360 Degree Metal Recycling, Inc.
Source Location:	54400 Smilax Rd., New Carlisle, IN 46552
County:	St. Joseph County
SIC Code:	5093
Operation Permit No.:	141-30660-00577
Permit Reviewer:	Jason R. Krawczyk

On August 12, 2011, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that 360 Degree Metal Recycling, Inc. had applied for a Minor Source Operating Permit to construct and operate a stationary vehicle and metal scrap shredding facility. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Due to several comments received by IDEM from interested parties, a public meeting was held on September 27, 2011 to give the public an opportunity to ask questions, make statements, and discuss air pollution concerns with IDEM staff. The period to provide comments on whether or not this period should be issued as proposed was extended until October 3, 2011.

Comments Received

During the Public Notice period between August 12, 2011 and October 3, 2011, IDEM OAQ received comments on the draft MSOP from the following people:

- o Jack Daly
- o Daniel Herbster, St. Joseph County Council, District 9
- o Mike Tierney
- o Donald Myers, Chief/Chairman Talligwei Indians
- o Ron Colpitts, Town Council Member, New Carlisle Town Council
- o Mary Countryman
- o Mary Ann Swope
- o Janet F. Greene
- o Richard D. Wynder
- o Gregory and Virginia Smith
- o Oleta Kaminski
- o Susan and Robert Widup
- o Troy Picton
- o Thomas and Susan A. Baker
- o Dean and Lucile Morehouse
- o Carolyn R. Higgins, President, New Carlisle Town Council
- o Beth Tierney
- o Tim Vanslager
- o Amy Beaven, MS
- o Andrea E. Halpin
- o Elizabeth Miller

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**.

General Comments

General Comment No. 1 (Multiple Interested Parties)

Several comments were received from concerned citizens, local town officials, tribal representatives, and a county councilman requesting that a public meeting or a public hearing be held regarding the draft 360 Degree Recycling, Inc. Minor Source Operating Permit.

Response:

Although IDEM did not hold a public hearing regarding the draft permit, staff did conduct a public meeting in New Carlisle on September 27, 2011. IDEM published a notice regarding the public meeting in the South Bend Tribune newspaper on September 12, 2011. Information about the meeting was also available on IDEM's website. Seventy-two local residents were able to attend the meeting. IDEM staff at the meeting included the permit writer Jason R. Krawczyk, section chief Alfred Dumauual, public meeting officer Doug Wagner, and public information officer Rob Elstro.

No changes to the permit were made as a result of this comment.

General Comment No. 2 (Multiple Interested Parties):

Several comments were received requesting the evaluation of whether land (e.g. solid waste) and water permits (e.g. storm water run-off, wetlands, wellhead protection, etc.), would be applicable to the facility based on the concerns that certain chemicals will be onsite and contaminants could migrate beyond the property lines or through the concrete foundation and enter the local aquifer. Certain comments requested IDEM, OAQ withhold issuance of the air permit until the facility has received operating approvals from IDEM's Office of Land Quality and Office of Water Quality.

Response:

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit.

IDEM's Office of Land Quality (OLQ) and Office of Water Quality (OWQ) are currently evaluating with the source whether any additional permitting actions are necessary.

No changes to the permit were made as a result of this comment.

General Comment No. 3 (Multiple Interested Parties):

Several comments were received expressing fears that the proposed operation is not located a sufficient distance from the town of New Carlisle and requesting that IDEM deny a permit unless the facility is able to locate elsewhere. Certain comments received addressed concerns about the effects of the facility on local property values.

Response:

IDEM recognizes that quality of life issues such as financial impacts of property values are very important. IDEM does not have legal authority to regulate zoning; therefore, IDEM does not have the authority to issue or deny a permit based on zoning and property value concerns. For issues related to zoning, citizens should contact their local government officials.

No changes to the permit were made as a result of this comment.

General Comment No. 4 (Jack Daly):

Fires and explosions have been a part of shredder operations in enough other locations to take a serious look at such dangers here in our neighborhood. While there are provisions in the permitting materials to address these issues, I have seen information that alludes to inspections and enforcement actions occurring only after-the-fact. By that time, the damage to our precious resources would have been done. We need assurances and regulations that would preclude any such environmental damage from happening, over and above mop-up plans for situations we are being assured will not occur.

Response:

Condition D.1.4 of the permit requires that the integral smart water injection system be in operation and control emissions from the vehicle/metal shredder at all times that the vehicle/metal shredder is in operation. The smart water injection system serves a primary purpose other than pollution control. Much of the effectiveness of the smart water injection system relates to the control of oxygen and temperature in the shredding chamber and the constant operation of the smart water injection system prevents fires and explosion.

No changes to the permit were made as a result of this comment.

General Comment No. 5 (Mike Tierney):

The proposed site already floods with water, when it rains hard. I was in all of the public meetings so far, and have seen the proposed holding ponds. The drawings used for the public hearings were said to be cartoons. The actual engineering remained to be done. Keeping car fluids out of the water table in our area is going to be very hard. We are forced to use "mound style" septic systems to protect the ground water. We know a concrete slab; the size they are talking about is going to have many cracks, allowing chemicals to seep into the ground. Keeping these ponds from flooding is another issue. I've worked with waste treatment plants, and it was very disturbing to hear the St. Joseph County representative who was responsible for enforcing code, say that "petroleum based products will sit on top of the water anyway". I worked for a plating company, and I know what Chrome can do in ground water. When I brought up heavy metals, everyone looked at me like I was crazy. I hope IDEM is taking a hard look at this.

Response:

IDEM's Office of Water Quality (OWQ) and Office of Land Quality (OLQ) are currently evaluating with the source whether any additional permitting actions are necessary.

The St. Joseph County Health Department has indicated that the 360 Degree Metal Recycling, Inc facility will be on its high priority inspection list and the operation will receive routine inspections to identify any threats or actual damage to the surface or groundwater.

No changes to the permit were made as a result of this comment.

General Comment No. 6 (Mike Tierney):

All of the research we have done on these shredder facilities shows multiple explosions and extreme dust. I understand there is water constantly poured on the shredder to keep the dust down. Handling the "fluff", left over, looks like a major issue that someone should be worried about. I also found it amazing the petitioners lawyer stated at the public hearing, there was no "air permit" required because there was no emissions. How do we trust these guys?

Response:

Condition D.1.4 of the permit requires that the integral smart water injection system to be in operation and control emissions from the vehicle/metal shredder at all times that the vehicle/metal shredder is in operation. The smart water injection system serves a primary purpose other than pollution control. Much of the effectiveness of the smart water injection system relates to the control of oxygen and temperature in the shredding chamber and the constant operation of the smart water injection system prevents fires and explosion.

The potentials to emit from the conveyance of bulk materials (e.g. "fluff") were evaluated and included in Appendix A to the Technical Support Document of the Public Notice draft. IDEM's Office of Water Quality (OWQ) and Office of Land Quality (OLQ) are currently evaluating with the source whether any additional permitting actions are necessary.

Prior to the submittal of the air permit application, the facility did not have the same emission factors available to them as IDEM had and may not have believed an air permit was necessary. Based on IDEM OAQ's approved emission factors the facility did require permitting and a draft permit, a technical support document, and potential to emit calculations were developed.

No changes to the permit were made as a result of this comment.

General Comment No. 7 (Mike Tierney):

Because the water table is so high in our area, the (ground) vibrations can already be felt from the train that passes. An occasional vibration is completely different from constant production. Again, no one wants to consider this, but I hope this is something IDEM watches.

Response:

IDEM recognizes that quality of life issues such as ground vibrations are very important. IDEM does not have legal authority to regulate vibrations; therefore, IDEM does not have the authority to issue or deny a permit based on this concern. For issues related to vibrations, citizens should contact their local government officials.

No changes to the permit were made as a result of this comment.

General Comment No. 8 (Multiple Interested Parties):

Several concerned citizens expressed concerns over noise issues.

Response:

IDEM recognizes that quality of life issues such as noise are very important. IDEM does not have legal authority to regulate noise; therefore, IDEM does not have the authority to issue or deny a permit based on this concern. For issues related to noise, citizens should contact their local government officials.

No changes to the permit were made as a result of this comment.

General Comment No. 9 (Multiple Interested Parties):

Several concerned citizens expressed concerns over increased traffic.

Response:

IDEM, OAQ cannot address issues for which is has no direct regulatory authority. Such questions regarding the effects on traffic and local infrastructure around the plant must be addressed with local authorities having jurisdiction in this matter.

In regards to emissions from truck or other vehicle engines, IDEM is not empowered by any rule to include emissions from mobile sources. U.S. EPA has exclusive authority to regulate mobile source emissions in Indiana. Therefore, emissions from trucks and transportation vehicles used for vehicle and scrap metal delivery to and from the site are not included in the air permitting review process. Potential emissions from the paved surfaces within the source property lines have been evaluated and are included in Appendix A to the Technical Support Document.

No changes to the permit were made as a result of this comment.

General Comment No. 10 (Multiple Interested Parties):

Several comments were received by citizens expressing concerns over the health implications from the air emissions released by the shredder, the effects on local crops and dairy farms, and the effects of particulates being deposited onto the soil and eventually being absorbed by plant life. Several citizens requested the permit be denied based on the potential adverse health effects.

One commenter cited:

According to OSHA, hazards exist when metals are ground, blasted, roasted or melted and fumes or metal dust are produced and distributed into the air. Heating fluff will generate smoke, dust and metal fumes and residue of high ash with a heavy metal and chlorine content. Toxic metals never leave the body; volatile organics cause short term or acute health problems; and particulates cause lung cancer, heart disease and premature death. I stated heating the fluff because we keep receiving conflicting stories about how they will process the waste materials.

According to the World Health Organization 2.4 million people die each year from causes directly attributed to air pollution. The EPA states that cardiopulmonary disease is directly linked to breathing fine particles of air pollution. Indiana falls into the highest risk category for developing lung cancer as well as the highest mortality rate according to a 2010 report from the Centers for Disease Control & Prevention. These airborne toxins will travel and enter the lungs of neighboring residents: small children, pregnant women, the elderly, and people with already compromised immune systems.

Response:

IDEM's Office of Air Quality has performed modeling that indicates that the 360 Degree Metal Recycling, Inc. facility's potential emissions will not violate any Primary National Ambient Air Quality Standards (NAAQS) which are protective of public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly, nor will the potential emissions violate any Secondary NAAQS standards, which are protective of public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based

standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit. For information on how to get involved in Indiana's Environmental Rulemaking Process, please go to <http://www.in.gov/idem/rules/involved.html>.

No changes to the permit were made as a result of this comment.

General Source Comment No. 11 (Multiple Interested Parties):

Several comments were received regarding Michigan's requirement for automobile shredders to operate a scrubber for control of emissions.

Response:

R 336.1224 is a Michigan state rule that applies to sources of air toxics. This rule requires the application of Best Available Control Technology for toxics (T-BACT) to sources emitting air toxics, and requires that emissions from the process meet the allowed impact levels. During each Best Available Control Technology analysis, which is done on a case-by-case basis, the reviewing authority evaluates the energy, environmental, economic and other costs associated with each alternative technology, and the benefit of reduced emissions that the technology would bring. The reviewing authority then specifies an emissions limitation for the source that reflects the maximum degree of reduction achievable for each pollutant evaluated.

There is no Michigan state law, rule, or regulation specifically requiring that a scrubber be required for all auto/metal shredding facilities. Additional technical information provided by the Michigan Department of Environmental Quality - Air Quality Division for scrap metal shredder plants can be found at: <http://www.deq.state.mi.us/aps/downloads/permits/c-p/Metal%20Shred.pdf>. These Michigan regulations do not apply to Indiana sources.

No changes to the permit were made as a result of this comment.

General Source Comment No. 12 (Multiple Interested Parties):

Several concerned citizens worried whether the local fire department could handle a fire or an emergency response situation.

Response:

IDEM, OAQ addresses regulations regarding a source's potential to emit pollutants and conducts a permit review to address the area of air pollution. By law, IDEM cannot address issues for which it does not have direct regulatory authority. Questions regarding issues such as local fire department capabilities must be directed to local authorities to address.

IDEM's Emergency Response Section is available 24 hours a day to receive spill reports and provide response assistance. The primary role of the section is to facilitate spill response actions from persons experiencing spills to soil and water. The section may also request assistance from the United States Environmental Protection Agency during air release emergencies. Environmental emergencies should be reported immediately to IDEM at 1-888-233-7745. This line is available 24 hours-a-day, every day.

No changes to the permit were made as a result of this comment.

General Comment No. 13 (Thomas Baker):

This business has been known for noise problems and fires. My family and I live close (within sight) to this project and feel that our local elected officials have let us down by allowing this project to move forward. If you look at the area they wish to build on you will see farm fields and homes mixed with a few factories that have been minor problems. The proposed recycling plant will be like all of its' other locations, dirty and polluted. They will exploit the land and leave.

Response:

The 360 Degree Metal Recycling, Inc. facility has applied to construct a "Greenfield Source". Although some related facilities may have had issues in the past, IDEM does not have the authority to regulate corporate character and does not have the authority to issue or deny a permit based on these concerns.

Noise issues have been addressed under Response to General Comment No. 8.

Fire issues have been addressed under Response to General Comment No. 12.

No changes to the permit were made as a result of this comment.

General Comment No. 14 (Andrea E. Halpin):

I am a resident of St. Joseph County, Indiana, who lives near New Carlisle. I am writing to request that IDEM require more frequent inspections for the 360 Degree Metal Recycling, Inc. facility (Minor Source Operating Permit 141-30660-00577). My friends and neighbors who live near the site are concerned about the integrity of their water supply and air quality. Groundwater and air contamination can cause health problems without obvious, immediate symptoms to those being affected. More frequent inspections of the site could find potential contamination on a timely basis. If you are unable to require more frequent inspections, then I respectfully request you deny the permit

Response:

IDEM has an Environmental Performance Partnership Agreement (EnPPA) with the U.S. Environmental Protection Agency Region 5. This biennial agreement identifies program specific priorities and program specific joint priorities between the two agencies. One aspect of the EnPPA is to develop and implement a Compliance Monitoring Strategy (CMS) for Title V and Federally Enforceable State Operating Permits (FESOPs). The CMS requires full compliance evaluations (inspections) of all Part 70 (Title V) sources once every two years, unless otherwise specified, and full compliance evaluations of all FESOP sources once every five years, except as noted in the CMS. There are no full compliance evaluation requirements for Minor Source Operating Permit (MSOP) sources, and these facilities will be inspected on an as-needed basis.

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit. For information on how to get involved in Indiana's Environmental Rulemaking Process, please go to <http://www.in.gov/idem/rules/involved.html>.

No changes to the permit were made as a result of this comment.

Technical Questions

Technical Question No. 1 (Mary Countryman):

Concerning the permit application, there are several questions not answered, boxes not filled out, sections that were cross referenced that weren't completed, signatures, and notary stamps missing on the application. I am concerned the lack of thoroughness in completing the required paperwork is a small sample of the lack of diligence needed to operate a facility dealing with a variety of potential dangers.

Response:

The 360 Degree Metal Recycling, Inc. permit application was deemed administratively complete. All permit application forms and subsequent revised forms were submitted to the local library within the statutory timeframe, in accordance with the requirements of 326 IAC 2-1.1-6.

No changes to the permit were made as a result of this comment.

Technical Question No. 2 (Mary Countryman):

Envirocorp believes the operation will result in the requirement for registration only'- what does 'registration only' mean? Is "believes" the same as their "opinion"? Does this mean they do not need an operating permit pursuant to 326 IAC 2-7? Will 360 Degree Metal Recycling, Inc. be subject to emission reporting?

Response:

The initial application received by IDEM, OAQ on June 24, 2011 had Part A: Purpose of the Application, Number 5, of the Air Permit Application Cover Sheet checked for Registration. Upon receipt of the application IDEM reviewed the potential to emit from the proposed facility and determined that the potential emissions exceeded the Registration thresholds. On July 21, 2011 IDEM, OAQ received revised application forms indicating that a Minor Source Operating Permit was being requested. The potential to emit from the facility are within the thresholds outlined in 326 IAC 2-6.1 (Minor Source Operating Permit Program). Therefore, IDEM, OAQ has developed preliminary findings, consisting of a draft permit and several supporting documents that would allow the applicant to construct and operate emission units in accordance with the requirements of 326 IAC 2-6.1.

Since the facility is subject to 326 IAC 2-6.1, it is not required to obtain an operating permit under 326 IAC 2-7 (Part 70 Permit Program).

360 Degree Metal Recycling, Inc. is not subject to the requirements of 326 IAC 2-6 (Emission Reporting) because it:

- 1) is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program);
- 2) will not be emitting VOC or NO_x at levels equal to or greater than twenty-five (25) tons of per year, and is not located in Lake, Porter, or LaPorte County; and
- 3) will not emit lead at levels equal to or greater than five (5) tons per year.

No changes to the permit were made as a result of this comment.

Technical Question No. 3 (Mary Countryman):

The dates throughout the application do not appear to be accurate (e.g. the date the application was filed at New Carlisle Public Library and the listed construction dates).

Response:

The facility has not commenced construction of any air emission units. The dates in Part O of the GSD-01 air permit application form are estimated dates. The initial permit application was received by IDEM, OAQ on June 24, 2011. Pursuant to 326 IAC 2-1.1-6, each applicant shall place a copy of the permit application or operating permit revision application for public review at a library in the county where the construction or modification is proposed within ten (10) days of the submission of an application. The initial application identified the date the application was submitted to the library as June 30, 2011, which is within the statutory timeframe. The additional permit application documents were received by IDEM on July 21, 2011 and indicated a copy was submitted to the library on July 15, 2011, which is also within the statutory timeframe.

No changes to the permit were made as a result of this comment.

Technical Question No. 4 (Mary Countryman):

The Metal Dynamics Permit was issued in June 2006, is a permit more than five years old accurate for comparison?

Response:

The Metal Dynamics permit, although referenced by the applicant in the permit application documents, was not used by IDEM in determining state rule applicability, permit level, or permit conditions. IDEM evaluates each facility on a case-by-case basis. The information used in IDEM's evaluation of potential emissions from this specific facility is included in the Technical Support Document and the Appendix A (calculations) to the Technical Support Document.

No changes to the permit were made as a result of this comment.

Technical Question No. 5 (Mary Countryman):

Will there be additional permits for storage of drained material (e.g. gas, anti-freeze, oil, etc.)? How much storage will be on-site? How long will drained material be stored on-site, and in what type of container?

Response:

IDEM's Office of Water Quality (OWQ) and Office of Land Quality (OLQ) are currently evaluating with the source whether any additional permitting actions are necessary.

The St. Joseph County Health Department in its Rezoning Application Review has required 360 Degree Metal Recycling, Inc. to store all liquid wastes removed from feed stock in structurally sound water tight containers, specifically designed for the storage of the respective waste and requires all containers to be stored either inside of a structure with a concrete or asphalt floor and no floor drain, or outside of a structure with structurally sound secondary containment capable of containing the full volume of all liquids stored.

Additionally, the St. Joseph County Health Department has restricted the capacity of the facility to no more than 500 vehicles that have not had their hazardous substances removed, and no vehicle or other feed stock for the shredder shall be stored onsite for more than 120 days.

No changes to the permit were made as a result of this comment.

Technical Question No. 6 (Mary Countryman):

The application does not address storage and handling of bulk materials on-site (e.g. mercury switches, shredder 'fluff-residue', tires, etc).

Response:

The potentials to emit from the conveyance of bulk materials have been evaluated and included in Appendix A to the Technical Support Document. There are no U.S. EPA AP-42 or webFIRE emission factors for the storage of bulk materials at auto shredding facilities and emissions are expected to be negligible.

No changes to the permit were made as a result of this comment.

Technical Question No. 7 (Mary Countryman):

What will be the temperature from Smart Water Injection System water runoff? Will the water be cooled? Is this a regulated waste stream? What are the collection and filtration requirements for the system?

Response:

The post use smart water injection system water will be routed through a carbon filter and into a lined retention pond. This water stream will be reused at the inlet of the shredder after passing through an additional particulate filter and the cycle is repeated. If the water stream is deemed unusable, the water will be collected into appropriate containers and shipped offsite for disposal. Carbon filters will be sampled to determine hazardous characteristics and disposed of off-site accordingly. The temperature of the smart water injection system will be slightly higher than ambient temperature at the outlet of the shredder due to the accumulation of residual heat from the shredder.

IDEM's Office of Water Quality (OWQ) and Office of Land Quality (OLQ) are currently evaluating with the source whether any additional permitting actions are necessary.

No changes to the permit were made as a result of this comment.

Technical Question No. 8 (Mary Countryman):

How often and by what methods (e.g. truck, rail, etc.) will there be waste transfer of bulk/liquid material? What route will any materials be using to be removed from the site?

Response:

IDEM, OAQ does not regulate waste transfer of bulk/liquid material or transportation routes. The source has indicated that it will utilize the nearby railway for some of its material transportation.

In regards to emissions from truck or other vehicle engines, IDEM is not empowered by any rule to include emissions from mobile sources. U.S. EPA has exclusive authority to regulate mobile source emissions in Indiana. Therefore, emissions from trucks and transportation vehicles used for vehicle and scrap metal delivery to and from the site are not included in the air permitting review process. Potential emissions from the paved surfaces within the source property lines have been evaluated and are included in Appendix A to the Technical Support Document.

No changes to the permit were made as a result of this comment.

Technical Question No. 9 (Mary Countryman):

Are there any stack systems for 360 Degree Metal Recycling, Inc. facility? The Metal Dynamics, LLC facility shows a stack.

Response:

There are no stacks through which any emission unit at the 360 Degree Metal Recycling, Inc. facility will be exhausting. The vehicle/metal shredder identified in the Metal Dynamics, LLC Registration No. R097-22690-00580 does not exhaust to a stack or vent either. The only stack identified in the Metal Dynamics, LLC Registration is P002, which is associated with the Z-Box cleaning system for metal/fluff for that facility. Since 360 Degree Metal Recycling, Inc. does not intend to operate a Z-Box system, there are no stacks associated with the facility.

No changes to the permit were made as a result of this comment.

Technical Question No. 10 (Mary Countryman):

The application for 360 Metal Recycling, Inc. states that the estimated operation for the facility is twelve (12) hours per day, five (5) days per week, and fifty-two (52) weeks per year. The Metal Dynamics, LLC information states eight (8) hours per day.

Response:

Regardless of the process operation schedule identified in the permit applications, IDEM assumes all emission units are operated 8,760 hours per year, or twenty-four (24) hours per day, seven (7) days per week, and fifty-two (52) weeks per year, when determining the permit level and the potentials to emit for the facility.

No changes to the permit were made as a result of this comment.

Technical Question No. 11 (Mary Countryman):

The 360 Degree Metal Recycling, Inc. calculations reference certain emission factors from the 1996 Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook". Are these figures the latest available for a Metal Shredder?

Response:

The U.S. EPA does not have any published emission factors in AP-42 or their webFIRE clearinghouse for inventories and emission factors. IDEM, OAQ used the most conservative emission factors that it had available for the calculation of potentials to emit.

No changes to the permit were made as a result of this comment.

Technical Question No. 12 (Mary Countryman):

What were the results of the Emissions tests obtained from Metal Dynamics obtained in the 60 - 180 days after their start up? Were they in compliance as projected? What were the actual numbers from those results?

Response:

The original Registration R097-22690-00580, issued to Metal Dynamics, LLC on June 26, 2006, required stack testing on both the vehicle/metal shredder (Emission Unit ID 001) and the Z-Box cleaning system for metal/fluff separation (Emission Unit ID 002). On July 24, 2006 Metal Dynamics, LLC appealed the stack testing condition for the vehicle/metal shredder since the emission unit does not have a stack and could not be tested in its designed configuration. On December 5, 2006 IDEM, OAQ issued a Registration Revision (097-23684-00580) that removed the stack testing requirement for Emission Unit ID 001.

On January 13, 2009, the facility tested Emission Unit ID 002 and observed particulate matter (PM) emissions of 0.024 pounds per hour (equal to 0.105 tons or 210 pounds per year). Pursuant to 326 IAC 6-3-2, particulate emissions from Emission Unit ID 002 were limited to less than 66.31 pounds per hour. Therefore, the stack test performed showed compliance with the Metal Dynamics, LLC emission limit.

No changes to the permit were made as a result of this comment.

Technical Question No. 13 (Mary Countryman):

How will the Emissions tests be affected since the 360 Degree Metal Recycling, Inc. facility will not have a Z-Box?

Response:

The emissions tests conducted by Metal Dynamics for their Z-box has no effect on this facility because this source is designed without a Z-Box.

No changes to the permit were made as a result of this comment.

Technical Question No. 14 (Mary Countryman):

Will the Gertrude Street Recycling business, that is also owned by the same company, be able to relocate to the 360 Degree Metal Recycling, Inc. location in the future?

Response:

In order for another facility or other emission unit, owned by the same company, to be able to relocate or construct at the 54400 Smilax Road, New Carlisle location, 360 Degree Metal Recycling, Inc. would be required to submit additional applications to IDEM, OAQ and to obtain prior approval (unless those emissions units meet the requirements of 326 IAC 2-6.1-6(d)). If the change or modifications meet the requirements of 326 IAC 2-6.1-6(d), the applicant is required to submit a notification concerning the change or modification within thirty (30) calendar days of making the change or modification.

No changes to the permit were made as a result of this comment.

Technical Question No. 15 (Mary Countryman):

Are there any past issues, resolved or unresolved, (contamination, cleanup, etc) with any of Mr. Schlipps businesses operating under other names (e.g. Gertrude Street Metal Recycling, Scrap Management Corporation, Randy's Recycling, Indiana Metal Processing Group, Gertrude Street U Pull It)?

Is Randall Schlipp in good standing with Indiana's Department of Environmental Management and Michigan's Department of Environmental Quality?

Response:

Each month, the IDEM Office of Enforcement publishes a list of enforcement actions and orders that were finalized during the previous month. New documents are added on a cycle around the middle of the month. The link to the list can be found on IDEM's webpage at the following address: <http://www.in.gov/ide/4107.htm> database is searchable by company name/person, case number, old case number, and county. IDEM, OAQ did a search of the identified business operating names between 1995 and present and found no enforcement violations.

The link to the Michigan Department of Environmental Quality webpage is: <http://www.michigan.gov/deg>.

IDEM does not have legal authority to regulate corporate character; therefore, IDEM does not have the authority to deny a permit based on these concerns.

No changes to the permit were made as a result of this comment.

Technical Question No. 16 (Mary Countryman):

Part B: Source Summary of the GSD-01 air permit application form states 'no existing approvals of exemptions, registrations, or permits.' Does this mean none of Mr. Schlipp's businesses have any of these?

Response:

The air permit application forms only apply to the facility that is requesting an air permit approval. This application only pertains to the 360 Degree Metal Recycling, Inc. facility to be located at 5440 Smilax Road, New Carlisle, IN 46552.

No changes to the permit were made as a result of this comment.

Technical Question No. 17 (Mary Countryman):

Is the 'Owner' Company also able to operate the source to which this application applies? The 'yes' proceed to part 'G' was checked, but the 'Same' is not listed as 360 Degree Metal Recycling, Inc. Will this allow transfer of ownership, or transfer of Randy's Recycling or Gertrude Street recycling to relocate to the Smilax Road site?

Response:

Changes in ownership or operational control of a source are allowable pursuant to 326 IAC 2-6.1-6 and do not require public notice or prior approval by IDEM, OAQ.

See response to Technical Question No. 14 regarding relocation of facilities to the source location.

No changes to the permit were made as a result of this comment.

Technical Question No. 18 (Mary Countryman):

Is the Smilax Road 360 Degree Metal Recycling, Inc. facility considered portable or stationary? Neither box in line item 10, Part A of the GSD-01 air permit application form was checked.

Response:

As identified in the Background and Description of New Source Construction section of the Technical

Support Document and Section A.1 of the permit document, the facility will be stationary.

No changes to the permit were made as a result of this comment.

Technical Question No. 19 (Mary Countryman):

On the Flow Diagram it states "No water is expected" subsequent to the crushing/shredding. If there is water, what happens?

Response:

The statement "no water is expected" refers to the fact that the water flow from the smart water injection system is regulated in an attempt to have the flow into the system coincide with the evaporation rate. No excess water is expected to remain from the process; however, if excess water does exist, it will be routed through a carbon filter and back to a retention pond for eventual reuse in the smart water injection system, offsite shipment, or evaporation.

No changes to the permit were made as a result of this comment.

Technical Question No. 20 (Mary Countryman):

On the GSD-06 air permit application form, Part B: Control of Particulate Emissions was left blank. Why?

Response:

The facility will not be operating any particulate emission control devices. The smart water injection system serves a primary purpose other than pollution control. Much of the effectiveness of the smart water injection system relates to the control of oxygen and temperature in the shredding chamber and the constant operation of the smart water injection system prevents fires and explosion.

No changes to the permit were made as a result of this comment.

Technical Question No. 21 (Mary Countryman):

In the initial application, Part A: Affidavit of Nonapplicability on the GSD-12 air permit application, it was not signed, notarized, or dated. Why?

Response:

The GSD-12 air permit application form is optional for all air permit applications submitted to IDEM, OAQ. The purpose of GSD-12 is to certify that the requirement to notify adjacent landowners and occupants is not applicable to the source of air pollutant emissions. The application received by IDEM, OAQ on June 24, 2011 originally requested a Registration, which does not require the notification of adjacent landowners and occupants pursuant to Indiana Code (IC) 13-15-8.

The subsequent application documents received by IDEM, OAQ on July 21, 2011 requested a Minor Source Operating Permit. The requirement to notify adjacent landowners and occupants pursuant to IC 13-15-8 applies since the facility is proposing to construct a minor source upon property that is undeveloped and for which a valid existing permit has not been issued. The facility submitted the optional GSD-13 air permit application form to certify that the requirement to notify adjacent land owners and occupants is applicable to the source as well as the required GSD-14 which identifies adjacent landowners and occupants that are to be notified that an air permit application has been submitted.

No changes to the permit were made as a result of this comment.

Technical Question No. 22 (Mary Countryman):

The Fugitive Dust Plan submitted with the application states that water or dust suppression will be used as needed and the yard surface will be cleaned as needed. Who defines as needed?

Response:

"As needed basis" is defined in 326 IAC 6-5-2 and means the frequency of application necessary to minimize visible particulate matter emissions. The requirements of 326 IAC 6-5 are not applicable to the source because it does not have the potential to emit fugitive particulate matter emissions of twenty-five (25) tons per year or more; therefore, the Fugitive Dust Plan that was submitted in the application, is not required to be incorporated into the permit.

No changes to the permit were made as a result of this comment.

Technical Question No. 23 (Mary Countryman):

The Metal Dynamics, LLC permit seems to have more detailed information concerning the fugitive dust control, particulate matter control, and particulate emissions.

Response:

IDEM, OAQ has reviewed the applicability of particulate emission limitations, fugitive dust requirements, and fugitive particulate matter emissions limitations for the 360 Degree Metal Recycling facility. These requirements were evaluated in the State Rule Applicability Determination section of the Technical Support Document. Any applicable requirements were incorporated in the draft permit document that was Public Noticed.

No changes to the permit were made as a result of this comment.

Technical Question No. 24 (Mary Countryman):

What type of training and education is required by the State of Indiana to own/operate a business that deals with all of the chemicals and pollutants involved in this industry? Is any certification required (e.g. Hazardous Material)?

Response:

IDEM, OAQ does not have the authority, under IDEM's air permitting regulations to require the owner, operator or employees to have any type of training, education or certification. Most owners and operators of sources are corporations. Owners and operators must comply with each air permit requirement regardless of training or education. IDEM air inspectors visit new sources to ensure that they understand their permit requirements and are prepared to follow them. Owners and operators that violate any air permit requirement are subject to fines of up to \$25,000 per day for each violation. Knowing or willful violations also subject the source and its employees to criminal prosecution.

No changes to the permit were made as a result of this comment.

Technical Question No. 25 (Jack Daly):

During the Public Meeting, there were concerns raised about the possibility of asbestos, from old brake pads and other components of the junked vehicles being shredded at this site, finding its way into the environment. We hadn't seen this particular potential emission listed in your preliminary findings and want

to know if that was going to be a part of your computations.

Response:

Asbestos was identified in the Clean Air Act Amendments of 1990 List of Hazardous air pollutant (HAP). Brake and clutch pads from older vehicles may contain asbestos; however, the potential to emit of asbestos was not estimated for this facility because there are no U.S. EPA AP-42 or webFIRE emission factors for asbestos emissions from vehicle shredding. The potential to emit asbestos is expected to be negligible for this facility. Even assuming that one hundred percent (100%) of the particulate emissions from the vehicle shredder were asbestos, the potential to emit is limited to 4.01 tons per year due to the material throughput limit. Therefore, no further evaluations have been made since the facility would still not be subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP).

No changes to the permit were made as a result of this comment.

Technical Question No. 26 (Jack Daly):

Will vehicles being routed to this proposed shredder be completely stripped of components containing hazardous substances before their arrival on site, particularly mercury from the various switches?

Response:

Vehicles arriving to the facility will not be required to have all hazardous substances removed prior to their arrival on site. Indiana Code 13-20-17.7-5 requires motor vehicle recyclers (automobile salvage recyclers, automobile scrap yards, hulk crushers, scrap metal processors, and vehicle disposal facilities) to remove all mercury switches from each end of life vehicle when the vehicle is received. If the facility receives any vehicles directly that have not had their mercury switches removed, under Indiana law, they must follow the End of Life Vehicle Solutions (ELVS) Mercury Minimization Plan to remove and recycle switches. This includes obtaining a container and educational materials from ELVS, properly removing the mercury switches when the vehicle is received, storing the mercury switches in the container provided, and shipping the switches to the mercury recycler in the container provided.

No changes to the permit were made as a result of this comment.

Technical Question No. 27 (Jack Daly):

It is of paramount importance that these hazardous potential emissions are dealt with, along with the lengthy list of potential pollutants and hazardous substances we already know this operation will be releasing into the environment, regrettably, in quantities that fulfill the currently approvable but horribly shortsighted "acceptable levels" in regulations as they exist today. Will it take a disaster here to realize that current regulations provide inadequate protection to the inhabitants of the area surrounding this proposed site?

Pointing at the EPA as being the ones who set these insufficiently protective 'acceptable levels' does not excuse IDEM from being more proactive than the EPA. Current news from the legislative fronts indicate that the EPA may go the way of the Dodo bird and \$2-per-gallon gasoline any day now, and where will that leave IDEM? People will want to know what IDEM intends to do, not some other agency.

Response:

This source's permit contains all the applicable emission limits and operating requirements set by the Indiana Air Pollution Control Board (IAPCB). The IAPCB, pursuant to Indiana statutory authority, sets all the air pollution control requirements. These standards are often set to match federal air pollution control requirements. These rules, as set out in air permits and as enforced by IDEM, OAQ have resulted in improved air quality in Indiana and currently Indiana is in attainment for all ambient air quality standards.

The rules currently before the IAPCB for consideration are available at <http://www.in.gov/idem/4710.htm> on IDEM's website. In addition, any citizen may propose additional rules for consideration by the IAPCB by following Indiana Code 13-14-8-5, which states:

- (a) Any person may present written proposals for the adoption, amendment, or repeal of a rule by one (1) of the boards. A proposal presented under this section must be:
 - (1) supported by a statement of reasons; and
 - (2) accompanied by a petition signed by at least two hundred (200) persons.

- (b) If the board with rulemaking authority in the subject area to which the rule pertains finds that the proposal:
 - (1) is not plainly devoid of merit; and
 - (2) does not deal with a subject on which a hearing was held within the previous six (6) months of the submission of the proposal; the board shall give notice and hold a hearing on the proposal.

No changes to the permit were made as a result of this comment.

Technical Question No. 28 (Jack Daly):

I have difficulty accepting as definitive the use of historical data, years past its date of generation, from facilities which are not a match for what 360 Degree Metal Recycling, Inc is proposing, as being sufficient for approval granting them an Air Quality permit. That data may be all that is available at present, but that cannot be taken as sufficient reason to green light this project. New data, generated from a facility that will operate in the same way as 360 Degree Metal Recycling, Inc. states their own facility will operate, needs to be compiled, perhaps through initiating requirements for pre-testing before permitting this facility.

It seems to me that all IDEM can really foresee of this proposed process at this point is construction plans. Verifiable data as to what and how this facility may be capable of releasing toxins into our local environment is what is needed, not information that is "as good as we've got". If the data to assure the hazard free operation of this facility is not available at this time, permits should not be granted for such a project at this time either.

Apologies and mop up operations after the fact will not be enough for those forced to endure the degradation of their living space.

Response:

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit.

No changes to the permit were made as a result of this comment.

Technical Question No. 29 (Mike Tierney):

My investigations showed that most of these types of car shredders operate in California. They have had these facilities there longer than anyone. Unfortunately, it looked like they were stopping authorization for more facilities, until they could firm up what they are starting to see. The "fluff" in the landfills was starting to show up with concerns of both ground water and air.

I can only suggest that if California has the most experience with these facilities, you try to get some supporting data from them, that identifies vehicle shredders as being safe. Surely CARB (California Air Resources Board) can give you something to work with.

Response:

IDEM, OAQ evaluated the information available online from the California Air Resource Board and did not find any additional information that would change the permit level of the facility or result in the addition of applicable requirements that are not already in the permit.

IDEM's Office of Land Quality (OLQ) and Office of Water Quality (OWQ) are currently evaluating with the source whether any additional permitting actions are necessary.

No changes to the permit were made as a result of this comment.

Technical Question No. 30 (Susan A. Baker):

All of the emission factor data is based on results from the Jackson, Michigan plant, which is not exactly the same as what is being proposed for installation in New Carlisle. It is our understanding that Michigan state law requires scrubbers on stacks, so we do not understand how you can use these inaccurate figures to base your permit?

Response:

R 336.1224 is a Michigan state rule that applies to sources of air toxics. This rule requires the application of Best Available Control Technology for toxics (T-BACT) to sources emitting air toxics, and requires that emissions from the process meet the allowed impact levels. During each BACT analysis, which is done on a case-by-case basis, the reviewing authority evaluates the energy, environmental, economic and other costs associated with each alternative technology, and the benefit of reduced emissions that the technology would bring. The reviewing authority then specifies an emissions limitation for the source that reflects the maximum degree of reduction achievable for each pollutant evaluated.

There is no Michigan state law, rule, or regulation specifically requiring that a scrubber be required for all auto/metal shredding facilities. Additional technical information provided by the Michigan Department of Environmental Quality - Air Quality Division for scrap metal shredder plants requesting to obtain a Michigan Permit to Install can be found at: <http://www.deq.state.mi.us/aps/downloads/permits/c-p/Metal%20Shred.pdf>.

The volatile organic compounds (VOC) and hazardous air pollutant (HAP) emission factors determined from the stack test results at the Jackson, Michigan facility, that were used by IDEM for this permit, were determined before the use of the cyclone and venturi scrubber. Another reason for not the using the emission factors after the scrubbers, IDEM evaluated that though venturi scrubbers are capable of some incidental control of VOCs and HAPs, generally they are limited to control PM and high solubility gases. The particulate matter emission factors used in determining potential emissions from the source are from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook", not from the test results from the Michigan plant.

No changes to the permit were made as a result of this comment.

Technical Question No. 31 (Susan A. Baker):

There is a 40 page manual from OSHA on shredder facilities and these are low paid, no benefit jobs, with no training provided; so, just how can you expect all violations to be turned in to IDEM (Rick Reynolds, OAQ inspector)?

Response:

Once a permit is approved and issued, the enforcement of the terms and conditions is administered by the

Compliance and Enforcement Branch within the Office of Air Quality. If the facility fails to comply with each and every permit condition or fails to submit their required reports, they may be subject to enforcement action.

No changes to the permit were made as a result of this comment.

Technical Question No. 32 (Susan A. Baker):

How can the fugitive dust control plan be deemed unnecessary?

Response:

The requirements of 326 IAC 6-5 are not applicable to the source because it does not have the potential to emit fugitive particulate matter emissions of twenty-five (25) tons per year or more; therefore, the Fugitive Dust Plan that was submitted in the application, is not required to be incorporated into the permit.

No changes to the permit were made as a result of this comment.

Technical Question No. 33 (Susan A. Baker):

Again, this is going to be a waste facility with continual mercury, asbestos, and other toxins always sitting on site. Just because 'one' auto may not sit longer than 90 or 120 days, does not excuse that fact that these toxins will always be present on this site AND on our aquifer. Indiana has the 4th highest mercury contamination rate in the county. Forbes rates Indiana at 49 of the 50 greenest states. What about our farmland? What about our water?

Response:

The permit being issued by IDEM Office of Air Quality simply establishes the provisions under which a source must be built and operated. The issuance of this permit does not excuse the company from their obligation to obtain any other required permit approvals from IDEM or any other governmental agency. IDEM's Office of Water Quality (OWQ) and Office of Land Quality (OLQ) are currently evaluating with the source whether any additional permitting actions are necessary.

No changes to the permit were made as a result of this comment.

Technical Question No. 34 (Susan A. Baker):

Why are you not requiring the concrete to be lined to protect the aquifer?

Response:

The Office of Air Quality (OAQ) has responsibility for air-related issues only, and has no authority to create permit conditions regarding soil, land, or water-related issues. Any citizen with a complaint about air, land or water pollution may contact IDEM's Complaint Coordinator at (800) 451-6027 ext. 24464. IDEM's Complaint Clearinghouse provides more information regarding filing complaints and is available at IDEM's website at <http://www.in.gov/contact/complaints/index.html>.

No changes to the permit were made as a result of this comment.

Technical Question No. 35 (Susan A. Baker):

Noxious gasses travel through the air. Why do these items not fall under IDEM's jurisdiction?

Response:

IDEM recognizes that quality of life issues such as odors are very important. IDEM does not have legal authority to regulate odor; therefore, IDEM does not have the authority to deny a permit based on these concerns. For issues related to odor, citizens should contact their local government officials.

No changes to the permit were made as a result of this comment.

Technical Question No. 36 (Susan A. Baker):

It is very discouraging that we were informed at this meeting that IDEM 'rarely' refuses to issue permits.

Response:

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit. For information on how to get involved in Indiana's Environmental Rulemaking Process, please go to <http://www.in.gov/idem/rules/involved.html>.

No changes to the permit were made as a result of this comment.

Technical Question No. 37 (Susan A. Baker):

We consider this to be more of an auto salvage operation, so shouldn't other permits be required?

Response:

IDEM's Office of Water Quality (OWQ) and Office of Land Quality (OLQ) are currently evaluating with the source whether any additional permitting actions are necessary.

No changes to the permit were made as a result of this comment.

Technical Question No. 38 (Donald Myers):

At the present time the residents of New Carlisle and this tribe has been involved with the Air Quality Control permit application with your bureau which we believe has not done an adequate investigation into this company's air contamination possibilities.

Therefore we ask that before this company receives full application approval, they be investigated for the chemicals that will be produced by the storing of and demolition of automobiles. The chemicals therein such automobiles will contaminate the underground Kankakee River that the company will sit on.

Response:

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit.

The Office of Air Quality (OAQ) has responsibility for air-related issues only, and has no authority to create permit conditions regarding soil, land, or water-related issues. Any citizen with a complaint about air, land or water pollution may contact IDEM's Complaint Coordinator at (800) 451-6027 ext. 24464. IDEM's

Complaint Clearinghouse provides more information regarding filing complaints and is available at IDEM's website at <http://www.in.gov/contact/complaints/index.html>.

No changes to the permit were made as a result of this comment.

Technical Question No. 39 (Troy Picton):

Can you guarantee that between I/N Tek & I/N Kote, Unifraz, Just Packaging, Edcoat, and the new proposed 360 Degree Metal Recycling, Inc. facility that the pollution levels will be acceptable for the residences in the close proximity?

Response:

IDEM's Office of Air Quality has performed modeling that indicates that the 360 Degree Metal Recycling, Inc. facility's potential emissions, in combination with background concentrations, will not violate any Primary National Ambient Air Quality Standards (NAAQS) which are protective of public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly, nor will the potential emissions violate any Secondary NAAQS standards, which are protective of public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

Please also see Response to Technical Question No. 47 for additional information regarding NAAQS.

No changes to the permit were made as a result of this comment.

Technical Question No. 40 (Tim Vanslager)

My concern is that any airborne particulates/contaminates that are released into the air will travel in whatever direction the wind is blowing at some point will be deposited into open bodies of water, which can contaminate the groundwater atop the aquifer.

How will just an Air Quality permit prevent the contamination of the groundwater and how will IDEM monitor the facility to ensure compliance, when it has been three (3) years since IDEM told Pick of the Chick egg farm to install lagoons and they have yet to comply?

Response:

IDEM's Office of Water Quality (OWQ) and Office of Land Quality (OLQ) are currently evaluating with the source whether any additional permitting actions are necessary.

In addition to inspections performed by IDEM inspectors, the facility is required to submit to IDEM, OAQ's Compliance and Enforcement Branch the following:

- 1) a Minor Source Operating Permit Annual Notification certifying whether the facility is still in operation and whether they are in compliance with the requirements of their permit;
- 2) an MSOP Quarterly Report showing compliance with their material throughput limit; and
- 3) a malfunction report.

Through these inspections, and reporting forms, IDEM, OAQ monitors the facility to ensure that they are in compliance with the applicable requirements of their permit.

No changes to the permit were made as a result of this comment.

Technical Question No. 41 (Multiple Interested Parties)

Does 360 Degree Metal Recycling, Inc. plan to keep sodium azide locked up, away from heat, and away

from sources of ignition? Do they plan to evaporate container residue under a fume hood? Do they plan to keep the chemical away from incompatibles such as metals?

Response:

The Office of Air Quality (OAQ) has responsibility for air-related issues only, and has no authority to create permit conditions regarding hazards outside of potential air emission releases. Sodium Azide, is not a regulated air pollutant and is not a hazardous air pollutant. Therefore, IDEM, OAQ does not have authority to require facilities to handle or store this substance in any particular manner. Any regulations that would apply to the storage, disposal or handling of this material would be the responsibility of IDEM's Office of Land Quality.

No changes to the permit were made as a result of this comment.

Technical Question No. 42 (Amy Beaven)

What standards have been introduced, reviewed, presented, or put into place to monitor the air standards (CO, NO_x, O₃, Pb, PM, and SO₂) for this project? What will IDEM do to ensure that these standards are set in place prior to the implementation of this project? Has a third party company been identified, contracted, or hired to monitor these standards?

Response:

Air quality monitoring is conducted across the state of Indiana for a variety of programs; National Ambient Air Quality Standards (NAAQS) compliance, air quality trends, Air Quality Index (AQI), air quality mapping (AIRNow), special monitoring projects, and others. Information about Indiana's air quality monitoring data is available at <http://www.in.gov/idem/4652.htm>.

Please also see Response to Technical Question No. 44 for additional information regarding National Ambient Air Quality Standards (NAAQS) for the criteria pollutants (CO, Pb, NO₂, PM (as PM₁₀ and PM_{2.5}), O₃, and SO₂).

IDEM, OAQ does not contract out monitoring. There are approximately sixty-five (65) air quality monitoring stations for various pollutants, located throughout the state of Indiana.

No changes to the permit were made as a result of this comment.

Technical Question No. 43 (Amy Beaven)

What will IDEM do to notify the public of any air emissions tests conducted at the facility and the results of these tests?

Response:

There is no permit condition requiring the facility to conduct performance tests because tests are not technically feasible based on the plant's design. There is no stack or vent and it is not possible to build an enclosure to conduct such tests. However, all information submitted to IDEM by this source, such as compliance reporting forms, will be made available to the public unless it is submitted under a claim of confidentiality in accordance with the requirements set out in 326 IAC 17.1-4-1.

IDEM has created a new "Virtual File Cabinet" (or "VFC") that can be accessed on-line, 24 hours per day at <http://12.186.81.89/Pages/Public/Search.aspx>. This new system has more than 9 million pages of public documents with more being added daily. The VFC currently contains records for:

- correspondence;
- state revolving fund programs;
- contracts;
- drinking water;
- leaking underground storage tanks (LUST);
- underground storage tanks (UST);
- Excess Liability Trust Fund (ELTF);
- Brownfields; and
- some landfill files.

The VFC features a simple, fill-in-the-blanks interface, much like any basic search engine. You can choose to search and sort the result by various categories:

- Under Facility Search:
 - Primary name is the name of the company, organization, or place under which the records were filed.
 - Location address is just that, the street address of the company, organization, or place that under which the records were filed.
 - City name is the city the company, organization, or place is located within and under which the records were filed.
 - County name, much like city name, is the county the company, organization, or place is located within and under which the records were filed.
 - Postal code is the postal ZIP code under which the records for the company, organization, or place were filed.
- Under Document Search:
 - Document date allows you to search for any documents that were published within a specific a period of time. You do not have to input both a start and an end date -- the search engine will return appropriate (although more diverse) results without both options filled in.
 - Program type refers to the IDEM program the document you are searching for was published from.
 - Document type is what kind of document you want to search for, such as an application, contract, monitoring, etc. Depending on what document type you choose, some additional search options may appear related to your document needs.

It is not necessary to fill-in all of the search blanks. As an example, you can simply do a search for a company in the Facilities Search, and then view all of the results to find the best match for you. Filling in more information simply allows for a more refined search.

No changes to the permit were made as a result of this comment.

Technical Question No. 44 (Amy Beaven)

Has the proposed area for the facility been designated as nonattainment for any criteria pollutants? If so, what was the process that led to the determination? What will IDEM require from this facility to reduce and maintain the least amount of emissions?

Have re-designation sites been proposed for the facility? If not, why? There is a clear dissatisfaction for the existence of this shredder in this location and people are not being heard. Will a re-designation site committee be formed? If redesignation sites have been identified, where are they located? How is the public informed?

Response:

The U.S. EPA has set National Ambient Air Quality Standards (NAAQS) for six common air pollutants, also called "criteria" pollutants. The criteria pollutants are carbon monoxide, nitrogen dioxide, ozone, lead, particulate matter and sulfur dioxide. NAAQS are often referred to as federal health standards for outdoor air.

The Clean Air Act, which was passed in 1970 and last amended in 1990, requires the EPA to set NAAQS for pollutants that cause adverse effects to public health and the environment. The Clean Air Act established primary and secondary air quality standards. Primary standards protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. The primary standard is often referred to as the health standard. Secondary standards protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings. Standards are reviewed periodically to ensure that they include the most recent scientific information.

Nonattainment areas are regions within the country where the concentration of one or more criteria pollutants exceeds the level set as the federal air quality standards. Once the EPA announces that an area does not meet the health standard, the state works with businesses, local governments, and the public to reduce the emissions from sources contributing to the nonattainment status of the area.

St. Joseph County has been designated attainment or unclassifiable for all criteria pollutants.

For more information on how the process of setting the NAAQS standards works and what the implications are if an area has been identified as nonattainment for a standard, please visit the following IDEM, OAQ website: <http://www.in.gov/idem/4654.htm>

IDEM, OAQ does not have authority to regulate site locations. IDEM must evaluate the application for this source based on the single site location proposed in the application. An applicant is not allowed to propose alternative site locations in its permit application. The location of industrial activities is regulated by local government entities through zoning requirements.

No changes to the permit were made as a result of this comment.

Technical Question No. 45 (Mary Countryman):

How will the emissions affect the dairy cows? Birth defects have been observed in animals exposed to Chromium. The cancer causing Chromium will be absorbed by the cows and passed through the milk that we drink.

Response:

IDEM's Office of Air Quality has performed modeling that indicates that the 360 Degree Metal Recycling, Inc. facility's potential emissions will not violate any Primary National Ambient Air Quality Standards (NAAQS) which are protective of public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly, nor will the potential emissions violate any Secondary NAAQS standards, which are protective of public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

In addition, 360 Degree Metal Recycling (141-30660-00577) passed IDEM's analysis for air toxics. Based on very health protective assumptions, emissions of air toxics from this facility do not have the potential to significantly impact human health. Total cancer risk for the source was at the lower end of U.S. EPA's acceptable risk range. The adverse non-cancer health effects hazard index for the source was below the U.S. EPA's target hazard index.

No changes to the permit were made as a result of this comment.

Technical Question No. 46 (Mary Countryman):

If this permit is granted, what will be the health and environmental impacts of the proposed facility? Will this impact violate current EPA standards?

Response:

Please see Response to Technical Question No. 45.

No changes to the permit were made as a result of this comment.

Technical Question No. 47 (Mary Countryman):

The permit fails to provide information concerning the removal of mercury switches. Mercury is also in anti-lock brake systems, cruise control switches, and lights. Mercury is listed on the IDEM auto salvage yard contaminants of concern. If this permit were issued, IDEM would be irresponsible to not have a mercury monitoring station installed nearby the proposed mercury source facility. The permit does not evaluate mercury emissions from the shredder and fails to acknowledge reporting of mercury. Can a mercury monitor be placed in New Carlisle since the nearest monitor is in Porter County?

Response:

Even though the permit does not directly address mercury, there is a separate Indiana rule that directly addresses mercury for metal recyclers. Indiana Code 13-20-17.7-5 requires motor vehicle recyclers (automobile salvage recyclers, automobile scrap yards, hulk crushers, scrap metal processors, and vehicle disposal facilities) to remove all mercury switches from each end of life vehicle when the vehicle is received. If the facility receives any vehicles directly that have not had their mercury switches removed, under Indiana law, they must follow the End of Life Vehicle Solutions (ELVS) Mercury Minimization Plan to remove and recycle switches. This includes obtaining a container and educational materials from ELVS, properly removing the mercury switches when the vehicle is received, storing the mercury switches in the container provided, and shipping the switches to the mercury recycler in the container provided. Therefore, a permit condition is not necessary in order to ensure that the mercury switches will be removed from vehicles prior to entering the vehicle/metal shredder.

The Indiana Ambient Air Monitoring Network Plan for 2012 is available on the IDEM website at <http://www.in.gov/idem/4652.htm>. A Network Review of this plan is conducted annually to determine any changes to be made to the network. Prior to submitting it to US EPA for its approval, this plan goes through a public comment period for input from the public, so the public has an opportunity input each year into this process. Information about Indiana's air monitoring system and monitoring results is available at <http://www.in.gov/idem/4116.htm>. Any citizen may request that additional mercury monitoring be performed in their area, during this public comment period. Information about current and expected air pollution levels is on IDEM's SmogWatch site at <http://www.in.gov/apps/idem/smog/> on the internet.

No changes to the permit were made as a result of this comment.

Technical Question No. 48 (Mary Countryman):

Steam emissions will likely be produced from the Smart Water Injection System's use, with particulate matter being absorbed and carried over property lines.

Response:

Modeled emissions account for not only filterable, but condensable particulate matter emissions. Modeling results show that the facility emissions, in combination with background concentrations from

other facilities in the area, will not exceed the National Ambient Air Quality Standards (NAAQS).

No changes to the permit were made as a result of this comment.

Technical Question No. 49 (Mary Countryman):

What happens during cold weather if the Smart Water Injection System were to freeze? Will the unit be allowed to operate?

Response:

Condition D.1.4 of the permit requires the integral smart water injection system to be in operation and control emissions from the vehicle/metal shredder at all times that the vehicle/metal shredder is in operation. It would be a violation of the permit if the facility were to operate the vehicle/metal shredder without the use of the smart water injection system. In case the smart injection system freezes, the source has to take reasonable response steps to correct such occurrence.

No changes to the permit were made as a result of this comment.

Technical Question No. 50 (Mary Countryman):

Why isn't mercury added to the National Ambient Air Quality Standards?

Response:

National Ambient Air Quality Standards (NAAQS) have only been identified for the six (6) "criteria pollutants", which are carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), particulate matter (PM₁₀ and PM_{2.5}), ozone (O₃), and sulfur dioxide (SO₂).

Mercury is identified on the U.S. EPA's list of Hazardous Air Pollutants (HAPs). Control of mercury and other HAPs have been targeted through the implementation of National Emissions Standards of Hazardous Air Pollutant (NESHAP) (a.k.a Maximum Achievable Control Technology (MACT)) standards, which regulate specific categories of stationary sources that emit (or have the potential to emit) one or more hazardous air pollutants listed in Section 112 of the Clean Air Act.

No changes to the permit were made as a result of this comment.

Technical Question No. 51 (Jack Daly):

In Section A of the Source Summary (Page 4 of 22), under subsection A.2(a), Emissions Unit EU-001 (the vehicle/metal shredder) is characterized as "exhausting to the ambient atmosphere". In the permit application, there are no stacks or vents identified for the shredder. How does the exhausting to the atmosphere take place?

Response:

The vehicle/metal shredder is a fugitive emission source, meaning that there are no ducted emissions or point sources for emissions to be exhausted. IDEM identifies the emission point as ambient, meaning that the emissions are being released to the immediate surroundings.

No changes to the permit were made as a result of this comment.

Technical Question No. 52 (Jack Daly):

In Section A, Subsection A.2(b), there is mention of a conveyor system, which will entail six (6) "wet" conveyors and one (1) "dry" conveyor. I am assuming that these are for the purpose of conveying the shredded material to a magnetic separation line, as mentioned in the permit application cover letter.

Are these conveyors inside a building or under a roof? What is the difference between a "wet" and a "dry" conveyor? Does the "wet-ness" of the six conveyors have anything to do with the separation process known as "Froth Floating", a separation process utilized in other shredding/recycling facilities?

Response:

The facility plans do not identify the construction of roofs over the conveyor systems. It appears that the conveyors will be outdoors, with some emptying into buildings for sorting to take place. The one (1) dry conveyor is the initial feed conveyor feeding into the vehicle/metal shredder. The smart water injection system on the vehicle/metal shredder is considered an integral control device. This system leaves the items in the downstream conveyors wet. Therefore the six (6) wet conveyor transfer points downstream use the controlled emission factor for determination of their potentials to emit.

Froth flotation is a process for selectively separating hydrophobic materials from hydrophilic. This process is used in several processing industries, but it has not been identified for use at this facility.

No changes to the permit were made as a result of this comment.

Technical Question No. 53 (Jack Daly):

In Section B - General Conditions, under Subsection B.3(a) - Affidavit of Construction, there is verbiage that indicates that the emission units (the shredder and related conveyors) will be free to operate as soon as IDEM is notified of the completion of construction. Such wording ignores expected consideration of other important permitting areas which should be brought to bear on this proposal by appropriate IDEM branches. There should be some wording to the effect that, having obtained the required Air Quality Permit from IDEM, construction and operation may begin only following completion of any other applicable permitting requirements along areas of environmental focus outside that of Air Quality.

Response:

The permit document becomes the approval to operate the air emissions units as long as the permit's attached Affidavit of Construction was submitted to IDEM, OAQ, verifying that the emission units were constructed as proposed in the application of the permit. The emissions units covered in the permit may begin operating on the date that the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed. 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 and attached to the permit. This approval does not give the facility approval to operate if they have not received all other required federal, state, or local approvals. This approval to operate pertains only to the air permit requirements.

No changes to the permit were made as a result of this comment.

Technical Question No. 54 (Jack Daly):

In Section B, Subsection B.6 - Enforceability, it states "... provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act."

What is the enforcement / inspection schema that will be put into place for this proposed operation, over

and above self-reporting and post exceedance inspections? What manner of enforcement will be made available to "citizens in accordance with the Clean Air Act"?

Response:

IDEM has an Environmental Performance Partnership Agreement (EnPPA) with the U.S. Environmental Protection Agency Region 5. This biennial agreement identifies program specific priorities and program specific joint priorities between the two agencies. One aspect of the EnPPA is to develop and implement a Compliance Monitoring Strategy (CMS) for Title V and Federally Enforceable State Operating Permits (FESOPs). The CMS requires full compliance evaluations (inspections) of all Part 70 (Title V) sources once every two years, unless otherwise specified, and full compliance evaluations of all FESOP sources once every five years, except as noted in the CMS. There are no full compliance evaluation requirements for Minor Source Operating Permit (MSOP) sources, and these facilities will be inspected on an as-needed basis, which includes responding to all air related complaints.

The quotation "citizens in accordance with the Clean Air Act" refers to Section 304 of the Clean Air Act, which is incorporated into Title 42, Chapter 85, Subchapter III, Section 7604 of the U.S. Code. Section 7604, subsection (a) reads:

- (a) Authority to bring civil action; jurisdiction
Except as provided in subsection (b) of this section, any person may commence a civil action on his own behalf-
- (1) against any person (including (i) the United States, and (ii) any other governmental instrumentality or agency to the extent permitted by the Eleventh Amendment to the Constitution) who is alleged to have violated (if there is evidence that the alleged violation has been repeated) or to be in violation of (A) an emission standard or limitation under this chapter or (B) an order issued by the Administrator or a State with respect to such a standard or limitation,
 - (2) against the Administrator where there is alleged a failure of the Administrator to perform any act or duty under this chapter which is not discretionary with the Administrator, or
 - (3) against any person who proposes to construct or constructs any new or modified major emitting facility without a permit required under part C of subchapter I of this chapter (relating to significant deterioration of air quality) or part D of subchapter I of this chapter (relating to nonattainment) or who is alleged to have violated (if there is evidence that the alleged violation has been repeated) or to be in violation of any condition of such permit.

The district courts shall have jurisdiction, without regard to the amount in controversy or the citizenship of the parties, to enforce such an emission standard or limitation, or such an order, or to order the Administrator to perform such act or duty, as the case may be, and to apply any appropriate civil penalties (except for actions under paragraph (2)). The district courts of the United States shall have jurisdiction to compel (consistent with paragraph (2) of this subsection) agency action unreasonably delayed, except that an action to compel agency action referred to in section 7607 (b) of this title which is unreasonably delayed may only be filed in a United States District Court within the circuit in which such action would be reviewable under section 7607 (b) of this title. In any such action for unreasonable delay, notice to the entities referred to in subsection (b)(1)(A) of this section shall be provided 180 days before commencing such action.

No changes to the permit were made as a result of this comment.

Technical Question No. 55 (Jack Daly):

In Subsection B.9(b) - Duty to Provide Information, it speaks of "claims of confidentiality" and their effect on requesting records for the facility and its operations. Has 360 Degree Metal Recycling, Inc. invoked this right in any way yet? Do these confidentiality claims apply to IDEM requests for information?

Response:

All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. A claim of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 326 IAC 17.1-4-1. 360 Degree Metal Recycling, Inc. did not

make a claim of confidentiality at any time during the submittal of their permit application information. Confidentiality claims only pertain to information being withheld from public record or available for public inspection. Information is not considered confidential from IDEM and is only considered confidential after approval from the commissioner.

More information on the Submittal of Confidential Claims can be found on IDEM's website at: <http://www.in.gov/idem/4819.htm>.

No changes to the permit were made as a result of this comment.

Technical Question No. 56 (Jack Daly):

In Subsection B.10(a) - Annual Notification, it speaks to "an annual notification...submitted by an authorized individual to the IDEM Office of Air Quality" concerning compliance with terms and conditions of the permit. Who are considered "authorized individuals"?

Response:

"Authorized individual", as defined by 326 IAC 2-1.1-1(1), means an individual responsible for the overall operation of one (1) or more manufacturing, production, or operating plants or a duly authorized representative of the person. For any public agency, the term means either a ranking elected official, the chief executive officer, or a designated representative of the person having responsibility for the overall operations of a principal geographic unit of the agency.

No changes to the permit were made as a result of this comment.

Technical Question No. 57 (Jack Daly):

In Subsection B.11(a) - Preventive Maintenance Plan, where PMPs and an associated inventory of spare parts for quick replacement are referred to, what exactly are the "circumstances beyond the Permittee's control" that would excuse 360 Degree Metal Recycling, Inc. from complying with this required PMP plan?

In Subsection B.11(b), it states "IDEM, OAQ 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." How does IDEM monitor the facility and its operations for "exceedances"?

Response:

"Circumstances beyond the Permittee's control" means any situation, including acts of God, arising from sudden and reasonably unforeseeable events beyond the reasonable control of the source.

In addition to inspections conducted by IDEM inspectors, the facility is required to submit to IDEM, OAQ's Compliance and Enforcement Branch the following:

- 1) a Minor Source Operating Permit Annual Notification certifying whether the facility is still in operation and whether they are in compliance with the requirements of their permit;
- 2) an MSOP Quarterly Report showing compliance with their material throughput limit; and
- 3) a malfunction report.

Through these inspections and reporting forms, IDEM monitors the facility to ensure that they are in compliance with the applicable requirements of their permit.

No changes to the permit were made as a result of this comment.

Technical Question No. 58 (Jack Daly):

In Subsection B.20 - Credible Evidence wherein is discussed compliance certifications and violations and the like, it states "... 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." What reporting procedures will be put into place for use by the local citizenry with such "credible evidence"?

Response:

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). These revisions provide minor modifications to existing regulatory provisions to clearly allow for the use of any credible evidence-that is, both reference test and comparable non-reference test data-to prove or disprove violations of the Clean Air Act in enforcement actions. These revisions make clear that enforcement authorities can prosecute actions based exclusively on any credible evidence, without the need to rely on any data from a particular reference test. The "credible evidence" revisions do not prescribe reporting procedures for citizens to bring civil action against a person who is alleged to have violated or to be in violation of an emission standard or limitation, against the Administrator, or against any person who proposes to construct or construct a facility without a permit, as authorized by Section 304 of the Clean Air Act.

No changes to the permit were made as a result of this comment.

Technical Question No. 59 (Jack Daly):

In Section C - Source Operation Conditions, Subsection C.1 - Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour, what does it actually say? Where do these estimated figures relating to potential emissions of pollution come from? Is it the task of IDEM to protect our environment, or to arrive at an "acceptable" level of the environmental degradation certain to result from this operation at this proposed location?

Response:

Section C.1 requires process particulate emissions from any process with a weight rate less than 100 pounds per hour to be less than 0.551 pounds per hour as long as that process is not exempt under 326 IAC 6-3-1(b) or (c). Low-emitting processes are not required to be subject to the process weight rule because these sources do not jeopardize the PM10 or PM2.5 National Ambient Air Quality Standards, nor are they subject to Prevention of Significant Deterioration, New Source Review, or other IDEM permitting requirements. Applying this rule to such small sources would impose unreasonable administrative and compliance burdens on these sources.

This condition is a general requirement incorporated into all Minor Source Operating Permit (MSOP) permits. 360 Degree Recycling, Inc. does not have any manufacturing processes with weight rates less than 100 pounds per hour. The condition is not determining potential emissions; it is limiting potential emissions from processes based on each process' weight throughput rate. Since this facility is to be located in St. Joseph County, which is not designated as nonattainment for any criteria pollutant, IDEM does not have the authority to deny the facility construction approval based on their potential emissions. The potential to emit from the facility does not violate any National Ambient Air Quality Standards (NAAQS). The NAAQS are the thresholds at which the U.S. EPA has determined criteria pollutants to pose a threat to public health and public welfare.

No changes to the permit were made as a result of this comment.

Technical Question No. 60 (Jack Daly / Mary Countryman):

What is a Z-Box? 360 Degree Metal Recycling, Inc. indicates that they will not be running with the use of a Z-Box. Did the facility whose figures are being used to estimate emissions levels have one in place? By comparing emissions figures between two facilities whose machinery differ in this way, are we comparing "apples to oranges"?

Response:

A Z-Box is a product cleaning system, which, for some facilities immediately follows the shredder. The "Z-Box" system is designed to provide the first separation of metallic materials from non-metallic materials based upon density, using air flow as a separation method. Material tumbles down through the Z-Box on a zigzag path and an upward current of air carries lighter material out to a cyclone, where the heaviest particles drop out.

The potentials to emit for 360 Degree Metal Recycling, Inc. were calculated based on the source specific capacities and operational designs. The Z-Box separator referenced in the application cover sheet was in reference to a similar automobile shredding facility located in Indianapolis, Indiana that had one in operation. 360 Degree Metal Recycling, Inc. has not applied to operate the Z-Box metal separation unit; therefore potentials to emit from this type of operation were not calculated.

No changes to the permit were made as a result of this comment.

Technical Question No. 61 (Jack Daly):

In Subsection C.3(a) and (b) - Opacity, there are various figures quoting degrees of opacity. Are we speaking of emissions that have impacted visibility in the area of this facility? There are figures quoted about how unclear "opaque" the shredder is allowed to make the air surrounding the plant within any specific time period, from one (1) six (6) minute averaging period, to one (1) six (6) hour period.

I for one think that the most stringent requirements concerning air opacity serve as the overall guideline. Mixing and matching across varying degrees of opacity and across shifting timelines only serves to cloud the issue which I believe is Air Quality.

Will there be air monitoring equipment required to be put in place for these purposes?

Response:

Opacity observations are made at the point of greatest opacity in the portion of a plume where condensed water vapor is not present. The six minute averaging period consists of twenty-four (24) consecutive observations recorded at 15 second intervals. The opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute period, and shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes in a six (6) hour period.

Opacity limitations are incorporated into the permit pursuant to 326 IAC 5-1-2 which was readopted into Title 326 of the Indiana Administrative Code by the Air Pollution Control Board on August 26, 2004 at 11:30 a.m. (28 IR 40). IDEM does not have the authority to require more stringent opacity limitations.

No monitoring equipment will be required for measuring opacity. Pursuant to 326 IAC 5-1-4, opacity determinations shall be made in accordance with 40 CFR 60, Appendix A, Conditional Test Method 9 or through a continuous opacity monitoring system if determined appropriate. For 360 Degree Metal Recycling, Inc. it was not determined that a continuous opacity monitoring system was appropriate.

No changes to the permit were made as a result of this comment.

Technical Question No. 62 (Jack Daly):

In Subsection C.6 - Fugitive Dust Emissions, it states "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"

Who will manage this and how?

Response:

The facility is responsible for ensuring fugitive dust does not escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. If fugitive dust is visible crossing the boundary or property line of a source any person may report the violation to the facility inspector Rick Reynolds at (574) 245-4888.

Complaints can also be submitted to IDEM three (3) different ways:

1. Online at: <http://www.in.gov/idem/5275.htm>;
2. Through the Complaint Coordinator at (800) 451-6027 ext. 24464; or
3. By printing, completing, and mailing a paper-based Complaint Submission Form (Available under Agency Forms at: <http://www.in.gov/idem/5157.htm>)

No changes to the permit were made as a result of this comment.

Technical Question No. 63 (Jack Daly):

In Subsection C.7 - Asbestos Abatement Projects, there appears to be wording that relates more to demolition of a building than shredding of a vehicle or recapture of brake pads. Since asbestos is a component that will be a part of the recycling process at this facility, there should be language that pertains to that particular type of operation.

Isn't the shredding process actually equivalent to a continuous "demolition" process?

Response:

Condition C.7 - Asbestos Abatement Projects specifically applies to demolition or renovation activities of facilities, not for potential process emissions of asbestos. The B and C Conditions of the permit are general requirements that apply to all Minor Source Operating Permit sources. The D Conditions of the permit pertain to source specific requirements.

For the purpose of condition C.7, "demolition" is defined as the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility (326 IAC 14-10-2(14)). Therefore, the shredding process would not be considered a demolition process.

No changes to the permit were made as a result of this comment.

Technical Question No. 64 (Jack Daly):

In Subsection C.8 - Performance Testing, the document speaks of requiring performance testing and submission of a testing protocol.

Will there be any performance testing required at this facility prior to the source beginning full operations? How does this relate to the language of Subsection B.3 - Affidavit of Construction, and its approval of

facility operations to begin?

Response:

The B and C Conditions of the permit are general conditions that apply to all Minor Source Operating Permits. The D Conditions of the permit pertain to source specific requirements. Performance testing is not being required for this facility because test is not technically feasible based on the plant's design. There is no stack or vent and it is not possible to build an enclosure to conduct such test.

No changes to the permit were made as a result of this comment.

Technical Question No. 65 (Jack Daly):

In Subsection C.11(b) - Instrument Specifications, it speaks of the Permittee being allowed to request the use of "an instrument that does not meet...specifications" if they convince IDEM of its 'adequacy'.

Why bother to put specifications in place and then allow a Permittee to circumvent those required specifications.

Response:

Condition C.11 - Instrument Specifications pertains to instruments used to measure parameters related to the operation of an air pollution control device. There is no D Condition in the permit that requires the measurement of air pollution control equipment parameters to ensure compliance with a permit condition. Therefore, this general requirement does not pertain to the facility.

No changes to the permit were made as a result of this comment.

Technical Question No. 66 (Jack Daly):

In Subsection C.12(a) - Response to Excursions or Exceedances, it speaks of 'reasonable response steps'..of restoring operations of the emissions unit to expected performance levels "as expeditiously as possible" following the discovery of an excursion or exceedance , so they can "minimize excess emissions".

Why this repeated use of such vague terminology? Why leave this extremely important issue, that being an effective response to the release of toxins into the environment, to terminology so blatantly subject to lawyerly interpretations? Any laxity in this area amounts to a dereliction of duty on the part of IDEM.

Response:

Condition C.12 sets out how the Permittee responds to an excursion where a response step is required by section D of the permit, and how the Permittee responds to an exceedance of a permit limit. When IDEM reviews how a Permittee responds to such a situation, IDEM looks at the totality of the circumstances that existed at the time and uses it discretion to determine if normal operations were restored as expeditiously as practicable.

No changes to the permit were made as a result of this comment.

Technical Question No. 67 (Jack Daly):

In the Fugitive Emissions section of the TSD, subsection (a) speaks of these 'criteria pollutants and hazardous air pollutants' counting in the consideration of 'applicability'...while in the following subsection (b), it states that such fugitive emissions do not count towards these determinations.

What fugitive emissions, is this referencing the ones referred to in Condition C.6 - Fugitive Dust Emissions of the permit? Is it referencing the ones that will not be allowed to escape beyond the property boundaries?

Is IDEM stating here that they will or won't be monitoring this operation for the migration of hazardous air pollutants beyond the property boundary?

Response:

Fugitive emissions are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability, but not towards the determination of 326 IAC 2-2 (Prevention of Significant Deterioration) or 326 IAC 2-7 (Part 70 Permit) applicability. Fugitive emissions are any emissions which could not reasonably pass through a stack, chimney, vent, or other functionally-equivalent opening.

Condition C.6 refers to fugitive dust, which is defined in 326 IAC 6-4-1 as the generation of particulate matter to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

"Fugitive dust" emissions are not the same as "fugitive emissions". Fugitive emissions of hazardous air pollutants are not restricted from escaping beyond the property line or boundaries of the property.

There are no monitoring requirements included in the permit for 360 Degree Metal Recycling, Inc.

No changes to the permit were made as a result of this comment.

Technical Question No. 68 (Jack Daly):

In the "Integral Part of the Process" Determination section of the TSD, it states "The high speed action of the rotary hammermill in the shredder creates high instantaneous temperatures in the shredder. The simultaneous presence of flammable materials and ignition sources may result in fires and explosions."

In securing consent from our County officials, the proponents of this project repeatedly state that such explosions and fires would not occur, as they had at other shredder facilities. Yet, they state here that they are an "Integral Part of the Process".

I submit that the proponents of this project have misstated their intentions and been less than revelatory in their dealings with local officials and IDEM as well, and in effect, have invalidated this application by doing so (according to IDEM's own rules and regulations regarding information submitted by applicants).

Response:

The smart water injection system has been determined to be an integral part of the shredding process. Condition D.1.4 of the permit requires the facility to operate the smart water injection system at all times that the vehicle/metal shredder is in operation, which will minimize the potential risk for explosion or fire. The facility properly identified that they were requesting the use of the smart water injection system as an integral part of the process and provided an adequate justification.

No changes to the permit were made as a result of this comment.

Technical Question No. 69 (Jack Daly):

In the final paragraph of the "Integral Part of the Process" Determination section of the TSD, it is stated that determination of emissions levels will be made "using potential to emit after the Smart Water Injection System".

What about the potential emissions that might occur in those parts of the process before shredding? What about the offloading stages when vehicles are first transferred to the facility? What about the potential emissions that may take place during the AutoTap removal of hazardous materials from the junk vehicles? Why isn't IDEM paying closer attention to the entry points of this process, every one of which poses a threat of pollutant emissions?

Response:

The potential particulate matter emissions, including PM10 and PM2.5, from the vehicle/metal shredder are evaluated after the use of the smart water injection system. Consequently, since the subsequent feedstock after the vehicle/metal shredder is wet, the controlled emission factors were used for the potential to emit from the downstream system conveyors. IDEM, OAQ has evaluated the potential air emissions from each of the identified processes. IDEM, OAQ addresses regulations regarding a source's potential to emit pollutants and conducts a permit review to address the area of air pollution. By law, IDEM cannot address issues for which it does not have direct regulatory authority.

No changes to the permit were made as a result of this comment.

Technical Question No. 70 (Jack Daly):

In the Permit Level Determination - MSOP section of the TSD, wherein the unlimited potential to emit (PTE) of the entire source before controls is listed, it speaks of 'control equipment' as being "not considered federally enforceable until it has been required in a federally enforceable permit."

Is this a federally enforceable permit? Will there be control equipment in operation at this facility or not?

Response:

Although the requirement to operate the smart water injection system is not federally enforceable, it is legally enforceable under Title 326 of the Indiana Administrative Code.

The smart water injection system is required to be in operation at all times the vehicle/metal shredder is in operation; however, the primary purpose of the smart water injection system is the prevention of fires and explosions.

No changes to the permit were made as a result of this comment.

Technical Question No. 71 (Jack Daly):

In the tables located in the Permit Level Determination - MSOP section of the TSD, it appears that pollutants such as VOCs, NOx, and HAPs are listed in expected emission amounts on the order of tons in some cases.

Where did these figures and estimates come from?

Response:

The potentials to emit were determined in the Appendix A to the Technical Support Document calculations, using emission factors from AP-42, reference stack tests, and industry provided estimates.

No changes to the permit were made as a result of this comment.

Technical Question No. 72 (Jack Daly):

The potentials to emit in the Potential to Emit of the Entire Source After Issuance of MSOP (tons/yr) table

of the TSD, the figures appear to be based on an expected 199,200 tons per year of material throughput.

At 90 tons per hour of throughput, stated as the maximum capacity, with the facility operating 4,320 hours in a year (7 days per week/12 hours per day/52 weeks per year (less two holidays)), my math shows that the material throughput is greater than 399,000 tons per year when operating at facility capacity.

Are we to assume that building a facility with twice as much potential material throughput as has been stated will occur; the applicants will never make use of that extra processing capacity?

What would the PTE be should this facility live up to its potential operating capacity? Who monitors this operation to ensure that they will stay within stated throughput levels and how will that monitoring be performed?

Would operating at capacity change the status of this facility from a Minor Source Operating Permit (MSOP)?

Response:

IDEM determines permit level and rule applicability based on the unrestricted potential to emit from the facility. IDEM bases initial potential to emit calculations on the assumption that a facility will operate a maximum of 8,760 hours per year (24 hrs/day, 7 days/wk, 52 wks/yr). The 199,200 tons per year of material throughput is not an expected throughput, it is a limited throughput. Permit Condition D.1.1 limits the facility to less than 199,200 tons per year in order to avoid the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) which requires a BACT analysis.

Permit Condition D.1.5(a) requires the source to maintain records of the material throughput to the vehicle/metal shredder at all times the vehicle/metal shredder is in operation.

Operating at the process operation schedule identified in Part B of the GSD-03 air permit application form (12 hrs/day, 5 days/wk, 52wks/yr) would have no affect on the permit level. The facility would still be required to comply with all permit conditions including the material throughput limit contained in Condition D.1.1.

No changes to the permit were made as a result of this comment.

Technical Question No. 73 (Jack Daly):

In subsections (b) and (c) of the Permit Level Determination - MSOP section of the TSD, it speaks of ten (10) tons per year of any single hazardous air pollutant as an acceptable level of emissions and a total combination of all HAPs less than twenty-five (25) tons per year as also being acceptable for IDEM's purposes.

This would include vast quantities of hazardous substances such as Benzene, Toluene, Hexane, Asbestos, and Lead, to name a few, spewed out in amounts on the order of tons per year (eighty-three hundredths (0.83) of which is specifically stated as the 'Worst Single Hap', Toluene). The acceptable level of lead to be emitted is up to five (5) tons per year.

Does IDEM really think that just putting the word acceptable on a piece of paper makes this heinous environmental degradation okay?

Response:

The subsections referenced are State Rule Applicability Determinations.

Subsection (b) pertains to 326 IAC 2-2 (Prevention of Significant Deterioration). This source is not a

major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Subsection (c) pertains to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)). This source is not a major source of HAPs, because 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.

Subsection (d) pertains to 326 IAC 2-6 (Emission Reporting). 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 Permit Program), 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.

No changes to the permit were made as a result of this comment.

Technical Question No. 74 (Jack Daly):

IDEM's computations once again, are based on the stated intention of the applicants to operate at 50% capacity.

Admittedly toxic and hazardous substances are going to be emitted into our local environment on the order of tons per year. What equipment and how many personnel will be utilized to ensure the compliance with these disappointing minimal limitations?

Response:

IDEM bases initial potential to emit calculations on the assumption that a facility will operate at a maximum capacity (100%) of 8,760 hours per year (24 hrs/day, 7 days/wk, 52 wks/yr) regardless of the process operation schedule identified by the source in Part B of the GSD-03 air permit application form.

IDEM understands the concerns of the citizens that compliance to the permit is very important. The permit contains monitoring, recordkeeping, and reporting requirements that are designed to ensure that the source is in compliance with its permit conditions. IDEM will inspect the source as needed and will review all the reports submitted by the source. If the commenter or citizens have complaints and issues with the source, with respect to compliance to its permit conditions, IDEM, OAQ recommends that citizens contact the current Compliance Inspector, Rick Reynolds at (574) 245-4888.

No changes to the permit were made as a result of this comment.

Technical Question No. 75 (Jack Daly):

In the section of the TSD identified as State Rule Applicability Determination, subsections (e) through (f), there is discussion about fugitive particulate emissions and the acceptable levels of the same, and also about the inapplicability of state requirements, all predicated upon the estimates of an operating capacity that the applicants have submitted to IDEM. In particular, in section (h), it is stated that "The source has the potential to emit less than ten (10) tons or more of particulate matter," making the previously described requirements inapplicable to this facility.

If we are to be expected to live with up to 10 tons of emitted particulate matter and construe that as 'acceptable' in some way, please describe what the actual components of these ten tons of emissions will be.

Response:

IDEM, OAQ does not speciate which constituents are contained in total particulate matter potentials unless those constituents are identified as hazardous air pollutants (HAPs). However, IDEM has developed an Addendum to the Technical Support Document Appendix A; in which, IDEM has included potential emissions from metal HAPs that may be present in the particulate emissions, where known emission factors existed.

The revised potential to emit calculations are included as Addendum to the Technical Support Document Appendix A.

Technical Question No. 76 (Jack Daly):

The actual shredder is not the only emitter in this process. There are to be seven (7) conveyors moving materials through various stages of this process, each of which has been described as having an operating capacity of 80 to 90 tons of material throughput per hour and could potentially contribute its own portion of 'allowable' emissions.

Are these emitters looked on as a part of the overall expected potential emissions of hazardous materials into the environment? Are IDEM's figures based on each of these emitters as separate contributors or are these individual emissions used to compile a unified figure of what IDEM will allow to be released into the environment in entirety by this facility?

Response:

IDEM has evaluated all emission units at this facility. The potential emissions from each individual emission source are evaluated individually for rule applicability. The combined potential to emit from all emission units at the source is used for permit level applicability.

Page 4 of 5 of the Technical Support Document Appendix A identifies the potentials to emit from the conveyors. These potentials to emit are also included in the Potential to Emit of the Entire Source After Issuance of MSOP (tons/year) table on page 4 of 8 of the Technical Support Document.

No changes to the permit were made as a result of this comment.

Technical Question No. 77 (Jack Daly):

In the Compliance Determination, Monitoring, and Testing Requirements section of the TSD, it is stated "The integral smart water injection system shall be in operation and control emissions from the vehicle/metal shredder (EU-001) at all times that the vehicle/metal shredder is in operation." Then it is further stated in subsection (b) of this section that "there are no testing requirements applicable to this source".

The application cover letter states that emissions control is not the primary purpose of the Smart Water Injection System. Emissions control is a hoped for side effect of what is primarily a fire and explosion suppression system.

If the Smart Water Injection System is the sole required method of control over particulate emissions from this facility (from the shredder through the conveyors) why does IDEM state there will be no requirement of testing to assure that this is an adequate method of emissions control?

Response:

The source will not have any emission units that have particulate emission limits that they need to

demonstrate compliance with through performance testing. The smart water injection system is considered an integral part of the process; therefore, it is required to operate at all times the vehicle/metal shredder is in operation. The smart water injection system serves another primary purpose other than pollution control (to prevent fires and explosions).

No changes to the permit were made as a result of this comment.

Technical Question No. 78 (Jack Daly):

In the Summary of Emissions table in Appendix A to the TSD, there is a note that speaks of the applicants making assurances that they will operate at 50% of capacity, in order to avoid certain regulations. IDEM states further in the note that their own estimations of particulate emissions and HAPs emissions are 'artificially lowered' based on assurances from the applicants that they will operate at 50% of capacity, but IDEM will not be testing or monitoring in ways over and above a system of self-reporting and after-the-fact responses to 'exceedances' or 'excursions'.

This lack of oversight is totally unacceptable when one considers the nature of this process and its proximity to our area water supply.

Response:

The note below the Limited Emissions (Tons/Yr) table on page 1 of 5 of Technical Support Document Appendix A refers to the permit requirement contained in Condition D.1.1, which limits the material throughput to the vehicle/metal shredder (EU-001) to 199,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The 199,200 ton per twelve consecutive month period material throughput limit is an enforceable condition of the permit.

Condition D.1.5 requires the source to document the compliance with Condition D.1.1 by maintaining the records of the material throughput to the vehicle/metal shredder each month and each compliance period. Condition D.1.6 requires the source to submit a quarterly summary of the information to document the compliance status with Condition D.1.1(a).

Within IDEM OAQ, the Compliance and Enforcement Branch has the responsibility and authority to enforce all of the provisions and requirements of all permits issued. If the facility does not comply with the conditions listed in their permit, they may be subject to enforcement actions. If such violations are determined to be knowing and willful violations, then the source may be subject to criminal prosecution.

No changes to the permit were made as a result of this comment.

Technical Question No. 79 (Jack Daly):

In the Unlimited Vehicle/Metal Shredder Emissions page of the Appendix A to the TSD, the note states that emissions projections are based on 'stack tests' performed on a facility in Michigan. The applicants are not planning on operating a facility with any stacks or vents in the shredder building, from what I understand.

Why isn't IDEM requiring 360 Degree Metal Recycling, Inc. to verify through testing the accuracy of these 'best guess' emissions estimates?

Response:

The 360 Degree Metal Recycling, Inc. facility does not have a stack and cannot be tested using Code of Federal Regulation (CFR) promulgated test methods in its current design configuration. IDEM's Compliance and Enforcement Branch's Stack Test Section has reviewed the stack test data submitted by the similar facility operating in Jackson, Michigan and believes the data submitted to be credible and

applicable for this similar operation. Using these stack tested emission factors, combined with the material throughput limitation, it is reasonable to believe the source will be in compliance with all state and federal air permitting requirements, without requiring the source to perform site specific testing. This initial determination to not require site specific stack testing does not preclude IDEM, OAQ from requiring a stack test be performed in the future. IDEM, OAQ has the authority to require testing at any time if IDEM feels it is warranted. If IDEM, OAQ were to require testing in the future, the source would be required to make any modifications necessary, in order to allow for the site specific testing to occur.

No changes to the permit were made as a result of this comment.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

(a) IDEM, OAQ has corrected a typographical error as follows:

...
C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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 ~~thirty~~ **forty** percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

...
(b) Upon further evaluation, IDEM, OAQ has revised the Best Available Control Technology (BACT) Avoidance Limit, as follows:

...
D.1.1 Best Available Control Technology (BACT) Avoidance Limit - VOC [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

(a) The material throughput to the vehicle/metal shredder (EU-001) shall not exceed 199,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) VOC emissions from the vehicle/metal shredder (EU-001) shall not exceed 0.25 lbs/ton of ~~material~~ **material** throughput.

(c) **The Permittee shall drain and remove (to the extent possible) all fluids from vehicles, appliances, industrial machinery, and other metal scrap received by the Permittee prior to shredding; or the Permittee shall document that inspections have been performed to confirm the non-existence of fluids. Fluids shall include, but are not limited to, gasoline, motor oil, antifreeze, transmission oil, brake oil, power steering fluid, hydraulic fluid, and differential fluid.**

Compliance with these limits shall limit the potential to emit of VOC from the vehicle/metal shredder (EU-001) to less than twenty five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

...

- (c) IDEM, OAQ has revised Condition D.1.2. Pursuant to 326 IAC 6-1-3(b)(14), the conveyors are exempt from the requirements of 326 6-3-2 because they have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pounds per hour.

...

D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]

-
- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the vehicle/metal shredder (EU-001) shall not exceed 50.23 pounds per hour when operating at a process weight rate of 90 tons per hour.
- (b) Pursuant to ~~326 IAC 6-3-2~~, the particulate matter (PM) from each of the conveyors shall not exceed ~~50.23 pounds per hour when operating at process weight rates of 90 tons per hour.~~

The pound per hour limitations ~~were~~ **was** calculated with the following equation:

...

- (d) IDEM, OAQ decided to clarify condition D.1.5.

...

D.1.5 Record Keeping Requirements

-
- (a) To document the compliance status with Condition D.1.1 **(a)**, the Permittee shall maintain records of the material throughput to the vehicle/metal shredder each month and each compliance period.

...

IDEM Contact

- (a) Questions regarding this proposed Minor Source Operating Permit can be directed to Jason R. Krawczyk 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) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (b) A copy of the permit 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

SUMMARY OF EMISSIONS

Company Name: 360 Degree Metal Recycling, Inc.
Address City IN Zip: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Plt ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011

Uncontrolled Emissions (Tons/Yr)				
Pollutant	Vehicle / Metal Shredder	Conveyors	Roadways (Fugitive)	Total
PM	15.89	1.51	5.60	23.00
PM10	15.89	0.54	1.12	17.55
PM2.5	15.89	0.46	0.28	16.63
VOC	98.55	-	-	98.55
NOx	-	-	-	0.00
SO2	-	-	-	0.00
CO	-	-	-	0.00
GHGs as CO2e	-	-	-	0.00
Single HAP (Toluene)	3.29	-	-	3.29
Combined HAPs	12.91	-	-	12.91

Note:

Vehicle/Metal Shredder emissions based on 100% automobiles being shredded.

Controlled Emissions (Tons/Yr)				
Pollutant	Vehicle / Metal Shredder	Conveyors	Roadways (Fugitive)	Total
PM	15.89	1.51	5.60	23.00
PM10	15.89	0.54	1.12	17.55
PM2.5	15.89	0.46	0.28	16.63
VOC	98.55	-	-	98.55
NOx	-	-	-	0.00
SO2	-	-	-	0.00
CO	-	-	-	0.00
GHGs as CO2e	-	-	-	0.00
Single HAP (Toluene)	3.29	-	-	3.29
Combined HAPs	12.91	-	-	12.91

Note:

Vehicle/Metal Shredder emissions based on 100% automobiles being shredded.

Limited Emissions (Tons/Yr)				
Pollutant	Vehicle / Metal Shredder	Conveyors	Roadways (Fugitive)	Total
PM**	4.01	1.51	5.60	11.13
PM10**	4.01	0.54	1.12	5.68
PM2.5**	4.01	0.46	0.28	4.75
VOC*	24.90	-	-	24.90
NOx	-	-	-	0.00
SO2	-	-	-	0.00
CO	-	-	-	0.00
GHGs as CO2e	-	-	-	0.00
Single HAP (Toluene)**	0.83	-	-	0.83
Combined HAPs**	3.26	-	-	3.26

Note:

*In order to avoid 326 IAC 8-1-6 (BACT), the source has agreed to take a throughput limit of 199,200 tons per twelve (12) consecutive month period.

**Particulate emissions and HAPs are artificially lowered based on the the 199,200 ton/yr throughput limit for the automobile shredder.

**ATSD Appendix A: Emissions Calculations
Unlimited Vehicle/Metal Shredder Emissions**

Company Name: 360 Degree Metal Recycling, Inc.
Address City IN Zip: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Pit ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011

Particulate Emissions

Process Description	Maximum Capacity	Particulate Emission Factor	PTE of PM/PM10/PM2.5	
	(tons/hr)	(lbs/ton)	(lb/hr)	(tons/yr)
Vehicle/Metal Shredder	90	0.0403	3.627	15.89

Note:
Material is wetted with an integral smart water injection system to minimize explosion and fire hazards.
The emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.E for dry milling of an 80% Auto & 20% Scrap throughput mixture.
Assumed PM = PM10 = PM2.5

Methodology:

PTE of PM/PM10 (lb/hr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton)
PTE of PM/PM10 (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton) * 8760 hrs / 2000 lbs.

VOC Emissions

Process Description	Maximum Capacity (tons/hr)	VOC Emission Factor		Auto PTE of VOC		Sheet PTE of VOC	
		Auto (lbs/ton)	Sheet (lbs/ton)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Vehicle/Metal Shredder	90	0.25	0.14	22.50	98.55	12.60	55.19

Note:
VOC emission factor is from the April 2010 Jackson, Michigan shredder VOC study conducted by OmniSource Corporation facility for a similar unit.
The PTE is based on the worst-case assumption that 100% auto scrap is being processed.

Methodology:

PTE of VOC (lb/hr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton)
PTE of VOC (ton/yr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton) * 8,760 hrs / 2,000 lbs.

HAP Emissions (Auto Shredding)		Organic HAPs											Metal HAPs			Polychlorinated Biphenyls	
Process Description	Maximum Capacity (tons/hr)	Hexane	Benzene	MIBK	Trichloroethene	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	Napthalene	Isooctane	Cadmium	Chromium	Lead	PCB's
		(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)
Vehicle/Metal Shredder	90	0.0037	0.0019	0.0002	0.0005	0.0083	0.0019	0.0068	0.0009	0.0025	0.0002	0.0002	0.00543	1.16E-06	1.28E-06	7.89E-06	0.0000873
		Hexane	Benzene	MIBK	Trichloroethene	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	Napthalene	Isooctane	Cadmium	Chromium	Lead	PCB's
		(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
		1.47	0.76	0.10	0.21	3.29	0.76	2.68	0.34	0.99	0.08	0.06	2.14	0.00	0.00	0.00	0.03

Combined HAPS: 12.91

HAP Emissions (Sheet Shredding)		Organic HAPs																
Process Description	Maximum Capacity (tons/hr)	Chloromethane	1,3 Butadiene	Acrolein	Dichloroethene	Hexane	Benzene	Trichloroethene	Methyl Methacrylate	MIBK	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	1,4 Dichlorobenzene	Napthalene
		(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)
Vehicle/Metal Shredder	90	0.0002	0.00003	0.00003	0.00006	0.00077	0.00025	0.00004	0.00007	0.00054	0.00241	0.00075	0.00261	0.00039	0.00103	0.00010	0.00004	0.00020
		Chloromethane	1,3 Butadiene	Acrolein	Dichloroethene	Hexane	Benzene	Trichloroethene	Methyl Methacrylate	MIBK	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	1,4 Dichlorobenzene	Napthalene
		(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
		0.01	0.01	0.01	0.02	0.30	0.10	0.02	0.03	0.21	0.95	0.29	1.03	0.15	0.41	0.04	0.02	0.08

Combined HAPS: 3.68

Note:
Organic HAP Emission Factors determined from the April 2010 TO-15 stack test performed at the Jackson, Michigan OmniSource Corporation facility. Emission Factors are averages of three test runs.
The Organic HAP PTE is based on the worst-case assumption that 100% auto scrap is being processed.
Metal HAP and PCB emission factors from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-11.F

Methodology:

HAP Emissions (tons/yr) = Maximum Capacity (tons/hr) * HAP (lbs/ton) * 8,760 hrs / 2000 lbs

**ATSD Appendix A: Emissions Calculations
Limited Vehicle/Metal Shredder Emissions**

Company Name: 360 Degree Metal Recycling, Inc.
Address City IN Zip: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Plt ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011

Particulate Emissions

Process Description	Limited Capacity (tons/yr)	Particulate Emission Factor (lbs/ton)	PTE of PM/PM10/PM2.5	
			(lb/hr)	(tons/yr)
Vehicle/Metal Shredder	199200	0.0403	3.63	4.01

Note:

Material is wetted with an integral smart water injection system to minimize explosion and fire hazards.
The emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.E for dry milling of an 80% Auto & 20% Scrap throughput mixture.
Maximum capacity = 90 tons/hr.
Assumed PM = PM10 = PM2.5

Methodology:

PTE of PM/PM10 (lb/hr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton)
PTE of PM/PM10 (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton) * 8760 hrs / 2000 lbs.

VOC Emissions

Process Description	Limited Capacity (tons/yr)	VOC Emission Factor		Auto PTE of VOC		Sheet PTE of VOC	
		(lbs/ton)	(lbs/ton)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Vehicle/Metal Shredder	199200	0.25	0.14	22.50	24.90	12.60	13.94

Note:

VOC emission factor is from the April 2010 Jackson, Michigan shredder VOC study conducted by OmniSource Corporation facility for a similar unit.
The PTE is based on the worst-case assumption that 100% auto scrap is being processed.
In order to avoid 326 IAC 8-1-6 (BACT), the source as agreed to take a throughput limit of 199,200 tons per (12) twelve consecutive month period.
Maximum capacity = 90 tons/hr.

Methodology:

PTE of VOC (lb/hr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton)
PTE of VOC (ton/yr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton) * 8,760 hrs / 2,000 lbs.

HAP Emissions (Auto Shredding)		Organic HAPs												Metal HAPs			Polychlorinated Biphenyls
Process Description	Limited Capacity (tons/hr)	Hexane	Benzene	MIBK	Trichloroethylene	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	Napthalene	Isooctane	Cadmium	Chromium	Lead	PCB's
		(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)
Vehicle/Metal Shredder	199200	0.0037	0.0019	0.0002	0.0005	0.0083	0.0019	0.0068	0.0009	0.0025	0.0002	0.0002	0.00543	#####	#####	#####	0.00008730
		0.37	0.19	0.02	0.05	0.83	0.19	0.68	0.08	0.25	0.02	0.02	0.54	0.00	0.00	0.00	0.01
Combined HAPS:																	3.26

HAP Emissions (Sheet Shredding)		Organic HAPs																	
Process Description	Maximum Capacity (tons/hr)	Chloromethane	1,3 Butadiene	Acrolein	Dichloroethene	Hexane	Benzene	Trichloroethylene	Methyl Methacrylate	MIBK	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	1,4 Dichlorobenzene	Naphthalene	
		(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)
Vehicle/Metal Shredder	199200	0.00002	0.00003	0.00003	0.00006	0.00077	0.00025	0.00004	0.00007	0.00054	0.00241	0.00075	0.00261	0.00039	0.00103	0.00010	0.00004	0.00020	
		1.64E-03	2.74E-03	3.29E-03	6.13E-03	0.08	2.45E-02	3.84E-03	6.68E-03	0.05	0.24	0.07	0.26	0.04	0.10	9.78E-03	3.83E-03	1.97E-02	
Combined HAPS:																			0.93

Note:

Organic HAP Emission Factors determined from the April 2010 TO-15 stack test performed at the Jackson, Michigan OmniSource Corporation facility. Emission Factors are averages of three test runs.
The Organic HAP PTE is based on the worst-case assumption that 100% auto scrap is being processed.
Metal HAP and PCB emission factors from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-11.F

Methodology:

HAP Emissions (tons/yr) = Maximum Capacity (tons/hr) * HAP (lbs/ton) * 8,760 hrs / 2000 lbs

**ATSD Appendix A: Emissions Calculations
Conveyor System Emissions**

**Company Name: 360 Degree Metal Recycling, Inc.
Address City IN Zip: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Plt ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011**

Conveyors

Process Description	Number of Emission Points	Maximum Capacity (tons/hr)	PM Emission Factor (lbs/ton)	PTE of PM (lb/hr)	PTE of PM (tons/yr)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/yr)	PM2.5 Emission Factor (lbs/ton)	PTE of PM2.5 (tons/yr)
Conveyor Transfer Point - wet*	6	90	1.40E-04	0.01	0.33	4.60E-05	0.11	1.30E-05	0.03
Conveyor Transfer Point - dry**	1	90	3.00E-03	0.27	1.18	1.10E-03	0.43	1.10E-03	0.43
Potential Emissions:					1.51		0.54		0.46

Note:

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

* The smart water injection system on the vehicle/metal shredder is considered an integral control device. This system leaves the items in the downstream conveyors wet. Therefore the controlled emission factor has been used for these conveyor transfer points.

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

No emission factor is identified for PM2.5 for dry conveying, therefore it is assumed PM10 = PM2.5

Methodology:

PTE (tons/yr) = Number of Emission Points x Maximum Capacity (tons/hr) x Emission Factor (lbs/ton) x 8760 (hrs/yr) x 1 ton/2000 lbs

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

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

Company Name: 360 Degree Metal Recycling, Inc.
Source Address: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Source ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011

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 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	50.0	1.0	50.0	20.0	1000.0	960	0.182	9.1	3318.2
Vehicle (leaving plant) (one-way trip)	50.0	1.0	50.0	20.0	1000.0	960	0.182	9.1	3318.2
Total			100.0		2000.0			18.2	6636.4

Average Vehicle Weight Per Trip = $\frac{20.0}{1.0}$ tons/trip
 Average Miles Per Trip = $\frac{0.182}{1.0}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	20.0	20.0	20.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = mean silt loading for iron and steel production facilities (AP-42 Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$

where p =	125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =	365	days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	1.847	0.369	0.0907	lb/mile
Mitigated Emission Factor, E_{ext} =	1.689	0.338	0.0829	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	3.06	0.61	0.15	2.80	0.56	0.14
Vehicle (leaving plant) (one-way trip)	3.06	0.61	0.15	2.80	0.56	0.14
	6.13	1.23	0.30	5.60	1.12	0.28

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit

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

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

Source Description and Location

Source Name: 360 Degree Metal Recycling, Inc.
Source Location: 54400 Smilax Rd., New Carlisle, IN 46552
County: St. Joseph County
SIC Code: 5093
Operation Permit No.: 141-30660-00577
Permit Reviewer: Jason R. Krawczyk

On June 24, 2011, the Office of Air Quality (OAQ) received an application from 360 Degree Metal Recycling, Inc. related to the construction and operation of a new vehicle and metal scrap shredding facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including St. Joseph 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 standard was revoked effective June 15, 2005.

Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
St. Joseph County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10)

tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) **Other Criteria Pollutants**
St. Joseph County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by 360 Degree Metal Recycling, Inc. on June 24, 2011, relating to the construction and operation of a new stationary vehicle and scrap metal shredding facility.

The following is a list of the new emission units and pollution control devices:

- (a) One (1) 4000 Hp DC electric vehicle/metal shredder, identified as EU-001, approved for construction in 2011, with a maximum throughput capacity of 90 tons/hr, using an integral smart water injection system as fire/explosion suppression and particulate control, and exhausting to the ambient atmosphere.
- (b) One (1) conveyor system, identified as EU-002, approved for construction in 2011, with a maximum throughput capacity of 90 tons/hr, consisting of:
- (1) Six (6) wet conveyors; and
 - (2) One (1) dry conveyor.
- (c) Paved roadways and parking lots with public access.

“Integral Part of the Process” Determination

The applicant has submitted the following information to justify why the smart water injection system should be considered an integral part of the vehicle/metal shredding process:

The material input to the vehicle/metal shredder process consists primarily of automobile bodies. These junk vehicle bodies typically contain flammable materials including "fluff" which consists of nonmetallic car parts, i.e. dashboards, upholstery, carpeting, etc. The high speed action of the rotary hammermill in the shredder creates high instantaneous temperatures in the shredder. The simultaneous presence of flammable materials and ignition sources may result in fires and explosions.

Much of the effectiveness of the smart water injection system relates to the control of oxygen and temperature in the shredding chamber. The constant operation of the smart water injection system prevents fires and explosion. Fires and explosions, if allowed to occur, would damage the shredding machine and would also result in shutdown of the process. Therefore, the smart water injection system

serves a primary purpose other than pollution control.

IDEM, OAQ has evaluated the information submitted and agrees that the smart water injection system should be considered an integral part of the vehicle/metal shredding process. This determination is based on the fact that the primary purpose of the smart water injection system is to prevent fires and explosions.

Therefore, the permitting level will be determined using the potential to emit after the smart water injection system. Operating conditions in the proposed permit will specify that the smart water injection system shall operate at all times when the vehicle/metal shredder is in operation.

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 – MSOP

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.

Pollutant	Potential To Emit (tons/year)
PM	23.00
PM10 ⁽¹⁾	17.55
PM2.5	16.63
SO ₂	0.00
NO _x	0.00
VOC	98.55
CO	0.00
GHGs as CO ₂ e	0.00

(1) 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".

HAPs	Potential To Emit (tons/year)
Hexane	1.47
Benzene	0.76
MIBK	0.10
Trichloroethene	0.21
Toluene	3.29
Ethylbenzene	0.76
m,p-Xylenes	2.68
Styrene	0.34
o-Xylene	0.99
Cumene	0.08
Napthalene	0.06
TOTAL HAPs	10.74

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC is each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) 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, 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.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Vehicle/Metal Shredder	4.01	4.01	4.01	-	-	24.90	-	-	2.70	0.83 Toluene
Conveyors	1.51	0.54	0.46	-	-	-	-	-	-	-
Roadways	5.60	1.12	0.28	-	-	-	-	-	-	-
Total PTE of Entire Source	11.13	5.68	4.75	-	-	24.90	-	-	2.70	0.83
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	10	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

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 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the vehicle/metal shredder (EU-001) shall be limited as follows:

- (a) The material throughput to the vehicle/metal shredder (EU-001) shall not exceed 199,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) VOC emissions from the vehicle/metal shredder (EU-001) shall not exceed 0.25 lbs/ton of material throughput.

Compliance with these limits shall limit the potential to emit VOC from the vehicle/metal shredder (EU-001) to less than twenty five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Nonferrous Metals Processing Area Sources, 40 CFR 63, Subpart TTTTTT, are not included in the permit, since the source does not engage in secondary nonferrous metals processing as defined in 40 CFR 63.11472.
- (c) There are no 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)

- (d) 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.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 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.
- (d) 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.
- (e) 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:

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (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.
- (f) 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The requirements of 326 IAC 6-5 are not applicable to the source because it does not have the potential to emit fugitive particulate matter emissions of twenty-five (25) tons per year or more.
- (h) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
The source is located in St. Joseph County; however, the requirements of 326 IAC 6.5 are not included in this permit since the source is not specifically listed in 326 IAC 6.5-7, does not have the potential to emit one hundred (100) tons or more of particulate matter, or actual emissions of ten (10) tons or more of particulate matter. The source has the potential to emit less than ten (10) tons per year of particulate matter. Therefore, the requirements of 326 IAC 6.5 are not applicable.

Vehicle/Metal Shredding

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the vehicle/metal shredder (EU-001) shall not exceed 50.23 pounds per hour when operating at a process weight rate of 90 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (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 integral smart water injection system shall be in operation at all times the vehicle/metal shredder (EU-001) is in operation.

- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from vehicle/metal shredder (EU-001) are greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from EU-001 to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the vehicle/metal shredder (EU-001) shall be limited as follows:

- (a) The material throughput to the vehicle/metal shredder (EU-001) shall not exceed 199,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) VOC emissions from the vehicle/metal shredder (EU-001) shall not exceed 0.25 lbs/ton of material throughput.

Compliance with these limits shall limit the potential to emit VOC from the vehicle/metal shredder (EU-001) to less than twenty five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

Conveyor System

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the conveyors shall not exceed 50.23 pounds per hour when operating at process weight rates of 90 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

Based on calculations, no control devices are needed to comply with these limits.

- (l) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (m) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and/or monitoring requirements applicable to this source are as follows:

The integral smart water injection system shall be in operation and control emissions from the vehicle/metal shredder (EU-001) at all times that the vehicle/metal shredder is in operation.
- (b) There are no testing requirements applicable to this source.

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 June 24, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 141-30660-00577. The staff recommends to the Commissioner that this New Source Construction MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk 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) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (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.in.gov/idem

SUMMARY OF EMISSIONS

Company Name: 360 Degree Metal Recycling, Inc.
Address City IN Zip: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Plt ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011

Uncontrolled Emissions (Tons/Yr)				
Pollutant	Vehicle / Metal Shredder	Conveyors	Roadways (Fugitive)	Total
PM	15.89	1.51	5.60	23.00
PM10	15.89	0.54	1.12	17.55
PM2.5	15.89	0.46	0.28	16.63
VOC	98.55	-	-	98.55
NOx	-	-	-	0.00
SO2	-	-	-	0.00
CO	-	-	-	0.00
GHGs as CO2e	-	-	-	0.00
Single HAP (Toluene)	3.29	-	-	3.29
Combined HAPs	10.74	-	-	10.74

Note:

Vehicle/Metal Shredder emissions based on 100% automobiles being shredded.

Controlled Emissions (Tons/Yr)				
Pollutant	Vehicle / Metal Shredder	Conveyors	Roadways (Fugitive)	Total
PM	15.89	1.51	5.60	23.00
PM10	15.89	0.54	1.12	17.55
PM2.5	15.89	0.46	0.28	16.63
VOC	98.55	-	-	98.55
NOx	-	-	-	0.00
SO2	-	-	-	0.00
CO	-	-	-	0.00
GHGs as CO2e	-	-	-	0.00
Single HAP (Toluene)	3.29	-	-	3.29
Combined HAPs	10.74	-	-	10.74

Note:

Vehicle/Metal Shredder emissions based on 100% automobiles being shredded.

Limited Emissions (Tons/Yr)				
Pollutant	Vehicle / Metal Shredder	Conveyors	Roadways (Fugitive)	Total
PM**	4.01	1.51	5.60	11.13
PM10**	4.01	0.54	1.12	5.68
PM2.5**	4.01	0.46	0.28	4.75
VOC*	24.90	-	-	24.90
NOx	-	-	-	0.00
SO2	-	-	-	0.00
CO	-	-	-	0.00
GHGs as CO2e	-	-	-	0.00
Single HAP (Toluene)**	0.83	-	-	0.83
Combined HAPs**	2.70	-	-	2.70

Note:

*In order to avoid 326 IAC 8-1-6 (BACT), the source has agreed to take a throughput limit of 199,200 tons per twelve (12) consecutive month period.

**Particulate emissions and HAPs are artificially lowered based on the the 199,200 ton/yr throughput limit for the automobile shredder.

Appendix A: Emissions Calculations
Unlimited Vehicle/Metal Shredder Emissions

Company Name: 360 Degree Metal Recycling, Inc.
Address City IN Zip: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Plt ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011

Particulate Emissions

Process Description	Maximum Capacity (tons/hr)	Particulate Emission Factor (lbs/ton)	PTE of PM/PM10/PM2.5	
			(lb/hr)	(tons/yr)
Vehicle/Metal Shredder	90	0.0403	3.627	15.89

Note:

Material is wetted with an integral smart water injection system to minimize explosion and fire hazards.
The emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.F for dry milling of an 80% Auto & 20% Scrap throughput mixture.
Assumed PM = PM10 = PM2.5

Methodology:

PTE of PM/PM10 (lb/hr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton)
PTE of PM/PM10 (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton) * 8760 hrs / 2000 lbs.

VOC Emissions

Process Description	Maximum Capacity (tons/hr)	VOC Emission Factor		Auto PTE of VOC		Sheet PTE of VOC	
		(lbs/ton)	(lbs/ton)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Vehicle/Metal Shredder	90	0.25	0.14	22.50	98.55	12.60	55.19

Note:

VOC emission factor is from the April 2010 Jackson, Michigan shredder VOC study conducted by OmniSource Corporation facility for a similar unit.
The PTE is based on the worst-case assumption that 100% auto scrap is being being processed.

Methodology:

PTE of VOC (lb/hr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton)
PTE of VOC (ton/yr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton) * 8,760 hrs / 2,000 lbs.

HAP Emissions (Auto Shredding)

Process Description	Maximum Capacity (tons/hr)	Hexane	Benzene	MIBK	Trichloroethene	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	Napthalene
		(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)
Vehicle/Metal Shredder	90	0.0037	0.0019	0.0002	0.0005	0.0083	0.0019	0.0068	0.0009	0.0025	0.0002	0.0002
		1.47	0.76	0.10	0.21	3.29	0.76	2.68	0.34	0.99	0.08	0.06

Combined HAPS: **10.74**

HAP Emissions (Sheet Shredding)

Process Description	Maximum Capacity (tons/hr)	Chloromethane	1,3 Butadiene	Acrolein	Dichloroethene	Hexane	Benzene	Trichloroethene	Methyl Methacrylate	MIBK	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	1,4 Dichlorobenzene	Napthalene
		(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)
Vehicle/Metal Shredder	90	0.00002	0.00003	0.00003	0.00006	0.00077	0.00025	0.00004	0.00007	0.00054	0.00241	0.00075	0.00261	0.00039	0.00103	0.00010	0.00004	0.00020
		0.01	0.01	0.01	0.02	0.30	0.10	0.02	0.03	0.21	0.95	0.29	1.03	0.15	0.41	0.04	0.02	0.08

Combined HAPS: **3.68**

Note:

HAP Emission Factors determined from the April 2010 TO-15 stack test performed at the Jackson, Michigan OmniSource Corporation facility.
Emission Factors are averages of three test runs.
The PTE is based on the worst-case assumption that 100% auto scrap is being being processed.

Methodology:

HAP Emissions (tons/yr) = Maximum Capacity (tons/hr) * HAP (lbs/ton) * 8,760 hrs / 2000 lbs

**Appendix A: Emissions Calculations
Limited Vehicle/Metal Shredder Emissions**

Company Name: 360 Degree Metal Recycling, Inc.
Address City IN Zip: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Plt ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011

Particulate Emissions

Process Description	Limited Capacity (tons/yr)	Particulate Emission Factor (lbs/ton)	PTE of PM/PM10/PM2.5	
			(lb/hr)	(tons/yr)
Vehicle/Metal Shredder	199200	0.0403	3.63	4.01

Note:
Material is wetted with an integral smart water injection system to minimize explosion and fire hazards.
The emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.F for dry milling of an 80% Auto & 20% Scrap throughput mixture.
Maximum capacity = 90 tons/hr.
Assumed PM = PM10 = PM2.5

Methodology:

PTE of PM/PM10 (lb/hr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton)
PTE of PM/PM10 (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton) * 8760 hrs / 2000 lbs.

VOC Emissions

Process Description	Limited Capacity (tons/yr)	VOC Emission Factor		Auto PTE of VOC		Sheet PTE of VOC	
		(lbs/ton)	Sheet (lbs/ton)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Vehicle/Metal Shredder	199200	0.25	0.14	22.50	24.90	12.60	13.94

Note:
VOC emission factor is from the April 2010 Jackson, Michigan shredder VOC study conducted by OmniSource Corporation facility for a similar unit.
The PTE is based on the worst-case assumption that 100% auto scrap is being processed.
In order to avoid 326 IAC 8-1-6 (BACT), the source as agreed to take a throughput limit of 199,200 tons per (12) twelve consecutive month period.
Maximum capacity = 90 tons/hr.

Methodology:

PTE of VOC (lb/hr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton)
PTE of VOC (ton/yr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton) * 8,760 hrs / 2,000 lbs.

HAP Emissions (Auto Shredding)

Process Description	Limited Capacity (tons/hr)	Hexane	Benzene	MIBK	Trichloroethene	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	Napthalene
		(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)
Vehicle/Metal Shredder	199200	0.0037	0.0019	0.0002	0.0005	0.0083	0.0019	0.0068	0.0009	0.0025	0.0002	0.0002
		Hexane (tons/yr)	Benzene (tons/yr)	MIBK (tons/yr)	Trichloroethene (tons/yr)	Toluene (tons/yr)	Ethylbenzene (tons/yr)	m,p-Xylenes (tons/yr)	Styrene (tons/yr)	o-Xylene (tons/yr)	Cumene (tons/yr)	Napthalene (tons/yr)
		0.37	0.19	0.02	0.05	0.63	0.19	0.68	0.08	0.25	0.02	0.02

Combined HAPS: **2.70**

HAP Emissions (Sheet Shredding)

Process Description	Maximum Capacity (tons/hr)	Chloromethane	1,3 Butadiene	Acrolein	Dichloroethene	Hexane	Benzene	Trichloroethene	Methyl Methacrylate	MIBK	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	1,4 Dichlorobenzene	Napthalene
		(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)
Vehicle/Metal Shredder	199200	0.00002	0.00003	0.00003	0.00006	0.00077	0.00025	0.00004	0.00007	0.00054	0.00241	0.00075	0.00261	0.00039	0.00103	0.00010	0.00004	0.00020
		Chloromethane (tons/yr)	1,3 Butadiene (tons/yr)	Acrolein (tons/yr)	Dichloroethene (tons/yr)	Hexane (tons/yr)	Benzene (tons/yr)	Trichloroethene (tons/yr)	Methyl Methacrylate (tons/yr)	MIBK (tons/yr)	Toluene (tons/yr)	Ethylbenzene (tons/yr)	m,p-Xylenes (tons/yr)	Styrene (tons/yr)	o-Xylene (tons/yr)	Cumene (tons/yr)	1,4 Dichlorobenzene (tons/yr)	Napthalene (tons/yr)
		1.64E-03	2.74E-03	3.29E-03	6.13E-03	0.08	2.45E-02	3.84E-03	6.68E-03	0.05	0.24	0.07	0.26	0.04	0.10	9.78E-03	3.83E-03	1.97E-02

Combined HAPS: **0.93**

Note:
HAP Emission Factors determined from the April 2010 TO-15 stack test performed at the Jackson, Michigan OmniSource Corporation facility.
Emission Factors are averages of three test runs.
The PTE is based on the worst-case assumption that 100% auto scrap is being processed.

Methodology:

HAP Emissions (tons/yr) = Maximum Capacity (tons/hr) * HAP (lbs/ton) * 8,760 hrs / 2000 lbs

**Appendix A: Emissions Calculations
Conveyor System Emissions**

**Company Name: 360 Degree Metal Recycling, Inc.
Address City IN Zip: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Plt ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011**

Conveyors

Process Description	Number of Emission Points	Maximum Capacity (tons/hr)	PM Emission Factor (lbs/ton)	PTE of PM (lb/hr)	PTE of PM (tons/yr)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/yr)	PM2.5 Emission Factor (lbs/ton)	PTE of PM2.5 (tons/yr)
Conveyor Transfer Point - wet*	6	90	1.40E-04	0.01	0.33	4.60E-05	0.11	1.30E-05	0.03
Conveyor Transfer Point - dry**	1	90	3.00E-03	0.27	1.18	1.10E-03	0.43	1.10E-03	0.43
Potential Emissions:					1.51		0.54		0.46

Note:

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

* The smart water injection system on the vehicle/metal shredder is considered an integral control device. This system leaves the items in the downstream conveyors wet. Therefore the controlled emission factor has been used for these conveyor transfer points.

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

No emission factor is identified for PM2.5 for dry conveying, therefore it is assumed PM10 = PM2.5

Methodology:

PTE (tons/yr) = Number of Emission Points x Maximum Capacity (tons/hr) x Emission Factor (lbs/ton) x 8760 (hrs/yr) x 1 ton/2000 lbs

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

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

**Company Name: 360 Degree Metal Recycling, Inc.
Source Address: 54400 Smilax Road, New Carlisle, IN 46552
Permit Number: M141-30660-00577
Source ID: 141-00577
Reviewer: Jason R. Krawczyk
Date: July 22, 2011**

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 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	50.0	1.0	50.0	20.0	1000.0	960	0.182	9.1	3318.2
Vehicle (leaving plant) (one-way trip)	50.0	1.0	50.0	20.0	1000.0	960	0.182	9.1	3318.2
Total			100.0		2000.0			18.2	6636.4

Average Vehicle Weight Per Trip = $\frac{20.0}{1.0}$ tons/trip
Average Miles Per Trip = $\frac{0.182}{1.0}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	20.0	20.0	20.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = mean silt loading for iron and steel production facilities (AP-42 Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$

	PM	PM10	PM2.5	
where p =	125			days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =	365			days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	1.847	0.369	0.0907	lb/mile
Mitigated Emission Factor, E_{ext} =	1.689	0.338	0.0829	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	3.06	0.61	0.15	2.80	0.56	0.14
Vehicle (leaving plant) (one-way trip)	3.06	0.61	0.15	2.80	0.56	0.14
	6.13	1.23	0.30	5.60	1.12	0.28

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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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

November 10, 2011

TO: New Carlisle Olive Township Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: 360 Degree Metal Recycling, Inc
Permit Number: 141-30660-00577

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07



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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Randall Schlipp
360 Degree Metal Recycling, Inc
54400 Smilax Rd
New Carlisle, IN 46552

DATE: November 10, 2011

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

SUBJECT: Final Decision
MSOP
141-30660-00577

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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Indianapolis, Indiana 46204
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Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: November 10, 2011

RE: 360 Degree Metal Recycling, Inc / 141-30660-00577

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

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Please Note: *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV.*

Enclosures
CD Memo.dot 11/14/08

Mail Code 61-53

IDEM Staff	MIDENNEY 11/10/2011 360 Degree Metal Recycling, Inc 141-30660-00577 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Randall Schlipp 360 Degree Metal Recycling, Inc 54400 Smilax Rd New Carlisle IN 46552 (Source CAATS) via confirm delivery										
2		Mr. Charles L. Berger Attorney Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
3		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
4		New Carlisle and Olive Twp 124 E Michigan St, P.O. Box Q New Carlisle IN 46552-0837 (Library)										
5		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
6		New Carlisle Town Council 113 South Arch Street, P.O. Box 6 New Carlisle IN 46552 (Local Official)										
7		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)										
8		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 (Health Department)										
9		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
10		Five Star Land Development, LLC 54370 Smilax Rd New Carlisle IN 46552 (Affected Party)										
11		Miller Jim 54537 Tulip Rd New Carlisle IN 46552 (Affected Party)										
12		Peterson Patrick 29580 Lynn St New Carlisle IN 46552 (Affected Party)										
13		Stemcor Corporation - Unifax Corporation 54401 Smilax Rd New Carlisle IN 46652 (Affected Party)										
14		Jack Daly P.O. Box 696 New Carlisle IN 46552 (Affected Party)										
15		Mary Ann Swope P.O. Box 1056 New Carlisle IN 46552 (Affected Party)										

Total number of pieces Listed by Sender 14	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Tim Vanslager 29417 US Highway 20 New Carlisle IN 46552 (Affected Party)										
2		Troy Picton 29921 Edison Rd New Carlisle IN 46552 (Affected Party)										
3		Amy Beaven 17707 Darden Rd South Bend IN 46635 (Affected Party)										
4		Mary Countryman P.O. Box 361 New Carlisle IN 46552 (Affected Party)										
5		Virginia Smith P.O. Box 224 Mew Carlisle IN 46552 (Affected Party)										
6		Tom Pietrzak 501 S. Bray St New Carlisle IN 46552 (Affected Party)										
7		Littman Elsa 7442 N. Walker Rd New Carlisle IN 46552 (Affected Party)										
8		Grimm Tracy P.O. Box 996 New Carlisle IN 46552 (Affected Party)										
9		Robert Elkins 471 E. Dunn Rd New Carlisle IN 46552 (Affected Party)										
10		Susan Widup 29736 US 20 New Carlisle IN 46552 (Affected Party)										
11		Susan Baker 29779 Edison Rd, P.O. Box 274 New Carlisle IN 46552 (Affected Party)										
12		Kimberley Huston 29167 US 20 New Carlisle IN 46552 (Affected Party)										
13		Stephen Studer 4101 Edison Lakes Pkwy, Suite 100 Mishawaka IN 46545 (Affected Party)										
14		Elias Russi P.O. Box 659 New Carlisle IN 46552 (Affected Party)										
15		Don Myers Chicamaugwa Tribal Office 31084 US 20 New Carlisle IN 46552 (Affected Party)										

Total number of pieces Listed by Sender 15	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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											Remarks
1		Mrs. Dean Szczodrowski-Morehouse 30250 US 20 New Carlisle IN 46552 (Affected Party)									
2		Susan Jones New Carlisle News 2866 North 925 East Mill Creek IN 46365 (Affected Party)									
3		Elizabeth Miller 51677 Sycamore Rd New Carlisle IN 46552 (Affected Party)									
4		Mike Tierney Hess Industries, Inc 30257 Redfield St Niles MI 49120 (Affected Party)									
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender 4	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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