



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 8, 2011

RE: Aleris Recycling, Inc. / 169 - 30783I - 00035

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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September 8, 2011

Mr. Archie Haney  
Aleris Recycling, Inc.  
305 Dimension Avenue  
Wabash, IN 46992

Re: Interim Significant Permit Revision Petition Approval  
169-30783I-00035

Dear Mr. Haney:

On August 12, 2011, the Office of Air Quality (OAQ) received an interim Significant Permit Revision petition from Aleris Recycling, Inc., located at 305 Dimension Avenue, in Wabash, Indiana for construction of two (2) new torit baghouses (MB3 and MB4). In addition, the source requested to upgrade the front and back sections of the existing tumbler, replace two (2) screens and conveyors, and modify the existing baghouses (MB1 and MB2). These changes will increase the maximum throughput of the entire milling operation from 14 tons per hour to 20 tons per hour of aluminum dross and/or salt cake.

A public notice of the interim Significant Permit Revision petition was published in the Wabash Plain Dealer on August 16, 2011. The public comment period ended on August 30, 2011.

Since there were no comments received during the public comment period, pursuant to 326 IAC 2-13-1(i), the interim Significant Permit Revision petition is in effect upon issuance and expires on the effective date of the final Significant Permit Revision permit.

The interim Significant Permit Revision petition may be revoked after its effective date upon a written finding by the Indiana Department of Environmental Management (IDEM) that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final Significant Permit Revision permit is denied. The IDEM has reviewed this interim Significant Permit Revision petition and has not found any such reason. The facilities specified in the interim Significant Permit Revision petition may not operate until the final Significant Permit Revision permit is issued by OAQ.

The interim Significant Permit Revision petition is federally enforceable. Detailed construction and operation conditions will be specified in the final Significant Permit Revision permit 169-30783-00035.

If you have any questions regarding this interim Significant Permit Revision petition, please contact Brian Williams, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Brian Williams or extension 4-5375, or dial (317) 234-5375.

Sincerely,

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Enclosure: Interim Permit Evaluation, Original Application, and Proof of Publication

**BMW**

cc: File – Wabash County  
Wabash County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch

## Indiana Department of Environmental Management Office of Air Management

### Interim Significant Permit Revision / Significant Source Modification Evaluation Sheet

<b>Company Name:</b> Aleris Recycling, Inc.	
<b>Location:</b> 305 Dimension Avenue, Wabash, IN 46992	<b>Permit No:</b> 169-307831-00035
<b>Permit Reviewer:</b> Brian Williams	<b>Date Receipt of Application:</b> 08/12/2011
	<b>Date of review:</b> 09/02/2011
<b>Description of the interim construction:</b> The source proposes to install two (2) new torit baghouses (MB3 and MB4), which will control emissions from the existing milling operation. In addition, the source will be upgrading the front and back sections of the existing tumbler, replacing two (2) screens, two (2) conveyors, and modifying the existing baghouses (MB1 and MB2). These changes will increase the maximum throughput of the entire milling operation from 14 tons per hour to 20 tons per hour.	
<b>Public Notice Period</b> = 08/16/2011 to 08/30/2011	
<b>Public Notice Date + 3 days = 17 days =</b> 09/02/2011	

Interim Petition Applicability: 326 IAC 2-13-1

- (a) Existing Source with valid permit;
- (b) Exemptions:
  - (1) construction of a PSD source or PSD modification;
  - (2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.
  - (3) any modification subject to 326 IAC 2-4.1.
- (c) Public notice comment period is 14 calendar days.

**Instructions: Check (✓) appropriate answers and make a recommendation.**

1. Did the applicant submit a written petition for an interim significant permit revision or significant source modification?

- Yes Go to question 2.  
 No Ignore verbal request.

2. Did the applicant pay the applicable interim permit fee? \$625 for TV, FESOP, and SSOA. \$500 for MSOP.

- Yes Go to question 3.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(1).

Comments: \_\_\_\_\_

3. Did the applicant state acceptance of federal enforceability of an interim significant permit revision or significant source modification?

- Yes Go to question 4.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).

4. Did the applicant or its authorized agent sign the application?

- Yes Go to question 5.

- No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).
5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim significant permit revision or significant source modification is issued), including, but not limited to:
- (a) Financial risk,  
(b) Risk that additional emission controls may be required,  
(c) Risk that the final significant permit revision or significant source modification may be denied.
- Yes Go to question 6.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).
6. Did the applicant begin construction prior to submitting the interim significant permit revision or significant source modification application?
- Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).  
 No Go to question 7.
7. What is the type of the interim construction?
- New Source Deny the application, pursuant to 326 IAC 2-13-1(a)  
 Modification to an existing source Go to question 8.
8. Did the applicant present data in the interim significant permit revision or significant source modification that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?
- Yes Go to question 9.  
 No Deny the application pursuant to:  
326 IAC 2-13-1(c)(2)(B), for PSD;  
326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;  
326 IAC 2-13-1(c)(2)(C), for state rules.
9. Is the proposed modification to be located in a nonattainment area?
- Yes Go to question 10.  
 No Go to question 11.
- County: Wabash County
- Comments: \_\_\_\_\_
10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?
- Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).  
 No Go to question 11.
11. Did the petition include a complete description of the process?
- Yes Go to question 12.  
 No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2).

12. Did the interim significant permit revision or significant source modification petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.
- Yes Go to question 13.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
13. Do the emission controls and/or throughput limits prevent PSD applicability?
- Yes Go to question 14.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?
- Yes Go to question 15.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?
- Yes Go to question 16.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?
- Yes Go to question 17.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
17. Does the applicant dispute applicability of any applicable state or federal rule?
- Yes Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).  
 No Go to question 18.
18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim significant permit revision or significant source modification petition?
- Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(1).  
 No Go to question 19.
19. Is there good reason to believe that information in the petition has been falsified?
- Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(7).  
 No Approve the interim significant permit revision or significant source modification petition.
20. Has the petition been adequately public noticed? A proof of publication copy is necessary.
- Yes Go to question 21.  
 No Deny the application, pursuant to 326 IAC 2-13-1(e).

Newspaper: Wabash Plain Dealer

Date of publication: August 16, 2011

21. Were comments received within seventeen (17) days after the public notice of the interim significant permit revision or significant source modification?

(14 calendar days for comment period + 3 working days for mailing)

- Yes Evaluate the comments received, and make a recommendation.  
 No Issue the final interim significant permit revision or significant source modification approval.

Comments: \_\_\_\_\_  
\_\_\_\_\_

Recommendation: Approve the interim significant permit revision

Date the applicant was informed of the decision: 09/06/2011

Method of informing the applicant: E-mail

169-30783i-00035

**Aleris Recycling, Inc.**  
305 Dimension Ave.  
P.O. Box 747  
Wabash, IN 46992  
Phone: 260-563-2409  
Fax: 260-563-3876



August 11, 2011

IDEM Air Permits Administration  
ATTN: Incoming Application  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, IN 46204-2251

**COPY**

To Whom It May Concern:

Re: Interim Petition Package  
Aleris Recycling, Inc.  
Wabash, Indiana  
FESOP No. F169-26165-00035

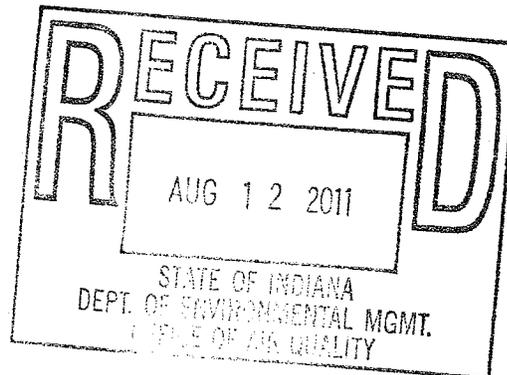
Aleris Recycling, Inc. (Aleris) is pleased to submit the enclosed interim petition package for your review. This is a petition for an interim construction approval for a significant permit revision to the referenced permit. Thank you in advance for your attention to this matter. If you have any questions, please contact me at (260) 569-8282 at any time.

Sincerely,

*Phillip Brown*  
Phillip Brown  
Plant Manager



2011 AUG 12 P 3:14



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

<b>Interim Petition Checklist</b>	
Instructions: (a) Please answer yes or no. (b) Enclosed this checklist with the completed interim petition package.	
Company Name: Aleris Recycling, Inc.	
Location: 305 Dimension Avenue, Wabash, Indiana 46992	
Yes	1. Is the written interim petition prepared?
Yes	2. Is the written petition signed and dated?
Yes	3. Is the public notice drafted?
Yes	4. Is the filing and review fee enclosed? \$625 for TV, FESOP, and SSOA. \$500 for MSOP.
Yes	5. Is the account number written on the check or money order?
Yes	6. Is the Affidavit of Construction signed, dated, and notarized?
Yes	7. Is the proposed modification/revision described in detail?
Yes	8. Is the proposed modification/revision a modification or addition to an existing source?
Yes	9. Is the proposed modification/revision located in an attainment area for all the criteria pollutants?
No	10. Is the proposed modification/revision located in a nonattainment area? If yes, answer No. 11.
	11. Is the pollutant, which the nonattainment designation is based on, going to be emitted in this proposed modification/revision?
Yes	12. Are potential emissions calculated?
Yes	13. Is federal enforceability consent specifically indicated?
Yes	14. Are specific conditions, limitations, and/or restrictions included that preclude applicability of PSD?
No	15. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NSPS?
No	16. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NESHAP?
Yes	17. Are specific conditions, limitations, and/or restrictions included that assure compliance with all applicable state air pollution rules?
Yes	18. Has a regular modification/revision permit application been submitted to OAQ?
No	19. Has the proposed modification/revision commenced prior to the submission of the interim permit petition?
Yes	20. The interim petition comment period has been decided to be: <u>14 calendar days</u>
Additional Comments:	

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

**PETITION FOR INTERIM SIGNIFICANT PERMIT REVISION, SIGNIFICANT SOURCE  
MODIFICATION, MINOR PERMIT REVISION, OR MINOR SOURCE MODIFICATION**

Source Name: Aleris Recycling, Inc.  
Source Address: 305 Dimension Avenue, Wabash, Indiana 46992  
Mailing Address: 305 Dimension Avenue, Wabash, Indiana 46992  
SIC/NAICS Code: 3341/331314

**Description of the Operation or Equipment:**

Below is a list of the changes to the source.

- Decommissioned Units: Two natural gas and oxygen-fired rotary furnaces (F1 and F2), salt cake cooling rack with hood, and baghouse with lime injection (FB1)
- Proposed Additions: Two (2) Torit Baghouses - Model No. 484RF12 (MB3 and MB4)
- Proposed Upgrades and Replacements: Tumbler front and back section upgrades (including liners), two (2) screen replacements, two (2) conveyor replacements, and safety upgrades to existing Torit Baghouse - Model 484RF12 (MB2)
- Proposed Throughput Changes: Change the maximum throughput of the entire milling operation from 14 to 20 tons of aluminum dross and/or salt cake per hour.
- Control Device Changes: The existing baghouse (MB1) controlling the tumbler will be reconfigured and used to control fugitive emissions from the raw material unloading area (RMUA), and the existing baghouse MB2 controlling the sizing line will be reconfigured and used to control the grizzly feeder, tumbler, and associated equipment. The control efficiency of the four baghouses is estimated to be 99.9% based on the manufacturer specifications for the filter bag media.

**Potential to Emit:**

Refer to Tables 4.1 and 4.2 for details on the methodology and calculations of the uncontrolled and controlled potential to emit (PTE) of the source and modification.

**PSD Requirements:**

Wabash County has been classified as attainment or unclassifiable for all criteria pollutants. Aleris Recycling is a secondary metal production facility, which is one of the twenty-eight listed source categories, as specified in 326 IAC 2-2-1(ff)(1). The PTE of particulates (i.e., PM and PM10) will be limited to less than 100 tons per year (tpy); therefore, Aleris will remain a minor source under PSD. Compliance will be demonstrated through the use of the four baghouses identified as MB1, MB2, MB3, and MB4. The baghouses will control particulates at all times when the source is in operation. In addition, the baghouses will be monitored and tested to ensure compliance with the limits, as required.

**NSPS Requirements:**

There is no applicable NSPS rule applicable to this operation or equipment.

**NESHAP Requirements:**

There is no applicable NESHAP rule applicable to this operation or equipment.

**State Rules & Requirements:**

- 326 IAC 1-6-3: Preventive Maintenance Plan
- 326 IAC 1-7: Stack Height
- 326 IAC 2-8-4: FESOP
- 326 IAC 5-1: Opacity
- 326 IAC 6-3-2: Particulate Emission Limitations for Manufacturing Processes

**Federal Enforceability:**

The company consents to the federal enforceability of this interim petition.

Signature: Phillip Brown

Printed Name: Phillip Brown

Title or Position: Plant Manager

Phone No.: (260) 569-8282

Date: August 11, 2011

TABLE 4.1

EMISSIONS SUMMARY  
ALERIS RECYCLING, INC.  
WABASH, INDIANA

Existing Uncontrolled PTE (tpy) (1):

<i>Emissions Unit/ Control Device</i>	CO	NO <sub>x</sub>	PM	PM10	PM2.5	SO <sub>2</sub>	VOC	HCl	Total HAPs
Two Oxy Furnace (F1 and F2)	4.42	0.023	512.1	512.4	512.4	0.032	0.289	N/D	67.4
Tumbler - Cyclone/ Baghouse (MB1)	0	0	65,174	1,787	1,787	0	0	N/D	0
Sizing Line - Baghouse (MB2)	0	0	4.99	1.48	1.48	0	0	N/D	0
Insignificant Activities (Estimated)	0.5	0.5	1.0	1.0	1.0	0.5	2.0	N/D	0
<b>Totals:</b>	<b>4.9</b>	<b>0.5</b>	<b>65,692</b>	<b>2,302</b>	<b>2,302</b>	<b>0.5</b>	<b>2.3</b>	<b>0.00</b>	<b>67.90</b>

Existing Limited PTE (tpy) (2):

<i>Emissions Unit/ Control Device</i>	CO	NO <sub>x</sub>	PM	PM10	PM2.5	SO <sub>2</sub>	VOC	HCl	Total HAPs
Two Oxy Furnace (F1 and F2)	4.42	0.02	22.0	22.3	22.3	0.03	0.29	9.99	9.99
Tumbler - Cyclone/ Baghouse (MB1)	0	0	17.5	17.5	17.5	0	0	0	0
Sizing Line - Baghouse (MB2)	0	0	5.00	1.48	1.48	0	0	0	0
Paved Roads	0	0	38.52	7.51	7.51	0	0	0	0
Insignificant Activities (Estimated)	0.5	0.5	1.0	1.0	1.0	0.5	2.0	0	0
<b>Totals:</b>	<b>4.9</b>	<b>0.5</b>	<b>84.0</b>	<b>49.8</b>	<b>49.8</b>	<b>0.5</b>	<b>2.3</b>	<b>9.99</b>	<b>9.99</b>

New Uncontrolled PTE (tpy):

<i>Emissions Unit/ Control Device</i>	CO	NO <sub>x</sub>	PM	PM10	PM2.5	SO <sub>2</sub>	VOC	HCl	Total HAPs
Raw Material Unloading Area (RMUA) - Cyclone/ Baghouse (MB1)	N/A	N/A	4.0E-02	4.0E-02	4.0E-02	N/A	N/A	N/A	8.7E-06
Grizzly Feeder (GF), Tumbler (T), Conveyors (C1-C8) - Baghouse (MB2)	N/A	N/A	21,024	21,024	21,024	N/A	N/A	N/A	4.6
Mega Slam (MS), Screen #1 (S1), Conveyors (C9-C11) - Baghouse (MB3)	N/A	N/A	21,024	21,024	21,024	N/A	N/A	N/A	4.6
Cage Mill (CM), Screen #2 (S2), Conveyors (C12-C14) - Baghouse (MB4)	N/A	N/A	21,024	21,024	21,024	N/A	N/A	N/A	4.6
Paved Roads	N/A	N/A	78	16	4	N/A	N/A	N/A	1.7E-02
Insignificant Activities (Estimated)	0.5	0.5	1.0	1.0	1.0	0.5	2.0	N/A	N/A
<b>Totals:</b>	<b>0.5</b>	<b>0.5</b>	<b>63,151</b>	<b>63,089</b>	<b>63,077</b>	<b>0.5</b>	<b>2.0</b>	<b>0</b>	<b>13.8</b>

New Limited PTE (tpy):

<i>Emissions Unit/ Control Device</i>	CO	NO <sub>x</sub>	PM	PM10	PM2.5	SO <sub>2</sub>	VOC	HCl	Total HAPs
Raw Material Unloading Area (RMUA) - Cyclone/ Baghouse (MB1)	N/A	N/A	1.2E-05	1.2E-05	1.2E-05	N/A	N/A	N/A	2.6E-09
Grizzly Feeder (GF), Tumbler (T), Conveyors (C1-C8) - Baghouse (MB2)	N/A	N/A	21	21	21	N/A	N/A	N/A	4.6E-03
Mega Slam (MS), Screen #1 (S1), Conveyors (C9-C11) - Baghouse (MB3)	N/A	N/A	16	16	16	N/A	N/A	N/A	3.4E-03
Cage Mill (CM), Screen #2 (S2), Conveyors (C12-C14) - Baghouse (MB4)	N/A	N/A	16	16	16	N/A	N/A	N/A	3.4E-03
Paved Roads	N/A	N/A	39	7.8	1.9	N/A	N/A	N/A	N/A
Insignificant Activities (Estimated)	0.5	0.5	1.0	1.0	1.0	0.5	2.0	N/A	N/A
<b>Totals:</b>	<b>0.5</b>	<b>0.5</b>	<b>92.7</b>	<b>61.4</b>	<b>55.5</b>	<b>0.5</b>	<b>2.0</b>	<b>0</b>	<b>1.1E-02</b>

New Limited PTE (lb/hr):

<i>Emissions Unit/ Control Device</i>	CO	NO <sub>x</sub>	PM	PM10	PM2.5	SO <sub>2</sub>	VOC	HCl	Total HAPs
Raw Material Unloading Area (RMUA) - Cyclone/ Baghouse (MB1)	N/A	N/A	2.7E-06	2.7E-06	2.7E-06	N/A	N/A	N/A	N/D
Grizzly Feeder (GF), Tumbler (T), Conveyors (C1-C8) - Baghouse (MB2)	N/A	N/A	4.8	4.8	4.8	N/A	N/A	N/A	N/D
Mega Slam (MS), Screen #1 (S1), Conveyors (C9-C11) - Baghouse (MB3)	N/A	N/A	3.6	3.6	3.6	N/A	N/A	N/A	N/D
Cage Mill (CM), Screen #2 (S2), Conveyors (C12-C14) - Baghouse (MB4)	N/A	N/A	3.6	3.6	3.6	N/A	N/A	N/A	N/D
<b>Totals:</b>	<b>0</b>	<b>0</b>	<b>12.0</b>	<b>12.0</b>	<b>12.0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

TABLE 4.1

EMISSIONS SUMMARY  
ALERIS RECYCLING, INC.  
WABASH, INDIANA

Modification Uncontrolled PTE (tpy) (3):

<i>Emissions Unit/ Control Device</i>	<i>CO</i>	<i>NOx</i>	<i>PM</i>	<i>PM10</i>	<i>PM2.5</i>	<i>SO<sub>2</sub></i>	<i>VOC</i>	<i>HCl</i>	<i>Total HAPs</i>
All	0	0	-2,107	61,284	61,284	0.0	0.0	0.0	13.8

Modification Controlled PTE (tpy) (4):

<i>Emissions Unit/ Control Device</i>	<i>CO</i>	<i>NOx</i>	<i>PM</i>	<i>PM10</i>	<i>PM2.5</i>	<i>SO<sub>2</sub></i>	<i>VOC</i>	<i>HCl</i>	<i>Total HAPs</i>
All	0	0	30.1	33.6	33.6	0	0	0	1.1E-02

Notes:

- (1) The existing uncontrolled PTE was obtained from Appendix A (page 9 of 9) of the TSD of the FESOP Renewal, No. 169-26165-00035, issued on January 15, 2009.  
 (2) The existing limited PTE was obtained in the TSD (page 5 of 9) of the FESOP Renewal, No. 169-26165-00035, issued on January 15, 2009.  
 (3) Modification Uncontrolled PTE (tpy) = (New Uncontrolled PTE of MB2 - Existing Uncontrolled PTE of MB1) + (New Uncontrolled PTE of MB3 + New Uncontrolled PTE of MB4 - Existing Uncontrolled PTE of MB2)  
 (4) Modification Controlled PTE (tpy) = (New Limited PTE of MB2 - Existing Limited PTE of MB1) + (New Limited PTE of MB3 + New Limited PTE of MB4 - Existing Limited PTE of MB2)

CO - Carbon Monoxide

FESOP - Federally Enforceable State Operating Permit

HAP - Hazardous Air Pollutant

HCl - Hydrochloric Acid

NOx - Nitrogen Oxides

PM - Particulate Matter

PM10 - Particulate Matter with a diameter less than or equal to 10 micrometers

PM2.5 - Particulate Matter with a diameter less than or equal to 2.5 micrometers

PTE - Potential to Emit

SO<sub>2</sub> - Sulfur Dioxide

tpy - tons per year

TSD - Technical Support Document

VOC - Volatile Organic Compounds

TABLE 4.2

PROPOSED MODIFICATIONS AND DETAILED EMISSIONS CALCULATIONS  
ALERIS RECYCLING, INC.  
WABASH, INDIANA

Description of Existing Emissions Units and Control Devices in FESOP No. F169-26165-00035:

- **Section D.2:** "(c) One (1) tumbler, consisting of one (1) screen, one (1) conveyor, one (1) feeding conveyor, and five (5) augers, controlled by a cyclone connected in series with a baghouse, identified as MB1, exhausting through Stack S-MB1, installed in 1996, capacity: 14.0 tons of aluminum dross and/or salt cake per hour."
- **Section D.3:** "(d) One (1) sizing line, consisting of one (1) grizzly feeder, one (1) primary crusher (Mega Slam), one (1) secondary crusher (Cage Mill), eight (8) conveyors, two (2) augers, two (2) screens, and three (3) holding tanks, all controlled by a baghouse, identified as MB2, exhausting through Stack S-MB2, installed in 1998, capacity: 14.0 tons of aluminum dross and salt cake per hour."

Source Modifications:

- **Decommissioned Units:** Two natural gas and oxygen-fired rotary furnaces (F1 and F2), salt cake cooling rack with hood, baghouse with lime injection (FB1)
- **Proposed Additions:** Two (2) Torit Baghouses - Model No. 484RF12 (MB3 and MB4)
- **Proposed Upgrades and Replacements:** Tumbler front and back section upgrades (including liners), two (2) screen replacements, two (2) conveyor replacements, safety upgrades to existing Torit Baghouse - Model 484RF12 (MB2)
- **Proposed Throughput Changes:** Change the maximum throughput of the entire milling operation from 14 to 20 tons of aluminum dross and/or salt cake per hour
- **Control Device Changes:** The existing baghouse (MB1) controlling the tumbler will be reconfigured and used to control fugitive emissions from the raw material unloading area (RMUA), and the existing baghouse MB2 controlling the sizing line will be reconfigured and used to control the grizzly feeder, tumbler, and associated equipment

New Proposed Description for FESOP:

- One (1) Raw Material Unloading Area, identified as RMUA, and controlled by one (1) baghouse, identified as MB1, exhausting through Stack S-MB1. One (1) Milling Operation, with a maximum capacity of 20 tons of aluminum dross and/or salt cake per hour, and consisting of the following emissions units: one (1) Grizzly Feeder, identified as GF; one (1) Tumbler, identified as T; one (1) primary crusher (Mega Slam), identified as MS; one (1) secondary crusher (Cage Mill), identified as CM; two (2) screens, identified as S1 and S2; and fourteen (14) conveyors, identified as C1 through C14; installed in 1996, 1998, and 2011. The MO is controlled by three (3) baghouses, identified as MB2, MB3, and MB4. MB2 controls the GF, T, and C1 through C8, and exhausts through Stack S-MB2. MB3, to be installed in 2011, controls MS, S1, and C9 through C11, and exhausts through Stack S-MB3. MB4, to be installed in 2011, controls CM, S2, and C12 through C14, and exhausts through Stack S-MB4.

Baghouse (MB1) Controlling RMUA:

Max. No. of Truck Deliveries (truck/day) (19) =	30
Avg. Truck Load Size (lb/truck) =	40,000
Max. Amount Unloaded (lb/day) (1) =	1,200,000
Max. Amount Unloaded (ton/hr) (2) =	75
Particle Size Multiplier (dimensionless) [k] (3) =	0.74
Mean Wind Speed (mph) [U] (3) =	1.3
Material Moisture Content (%) [M] (3) =	4.8
Emission Factor (lb/ton) [E] (3) =	0.00012
Uncontrolled PM/PM10/PM2.5 PTE (tpy) (4) =	4.0E-02
Capture Efficiency (wt. %) (5) =	30%
Fugitive PM/PM10/PM2.5 PTE (tpy) (18) =	2.8E-02
Control Efficiency (wt. %) (6) =	99.9%
Controlled PM/PM10/PM2.5 PTE (tpy) (7) =	1.2E-05

TABLE 4.2

PROPOSED MODIFICATIONS AND DETAILED EMISSIONS CALCULATIONS  
ALERIS RECYCLING, INC.  
WABASH, INDIANA

Baghouse (MB2) Controlling GF, T, and C1 through C8:

Maximum Throughput (ton/hr) (19) =	20
Uncontrolled PM/PM10/PM2.5 Emission Factor (wt. %) (8) =	12%
Uncontrolled PM/PM10/PM2.5 PTE (tpy) (9) =	21,024
Control Efficiency (wt. %) (6) =	99.9%
Controlled PM/PM10/PM2.5 PTE (tpy) (7) =	21

Baghouse (MB3) Controlling MS, S1, and C9 through C11:Uncontrolled PTE Calculation

Maximum Throughput (ton/hr) (19) =	20
Uncontrolled PM/PM10/PM2.5 Emission Factor (wt. %) (8) =	12%
Uncontrolled PM/PM10/PM2.5 PTE (tpy) (9) =	21,024

Controlled PTE Calculation

Maximum Throughput (ton/hr) (19) =	15
Uncontrolled PM/PM10/PM2.5 Emission Factor (wt. %) (8) =	12%
Uncontrolled PM/PM10/PM2.5 PTE (tpy) (9) =	15,768
Control Efficiency (wt. %) (6) =	99.9%
Controlled PM/PM10/PM2.5 PTE (tpy) (7) =	16

Baghouse (MB4) Controlling CM, S2, and C12 through C14:Uncontrolled PTE Calculation

Maximum Throughput (ton/hr) (19) =	20
Uncontrolled PM/PM10/PM2.5 Emission Factor (wt. %) (8) =	12%
Uncontrolled PM/PM10/PM2.5 PTE (tpy) (9) =	21,024

Controlled PTE Calculation

Maximum Throughput (ton/hr) (19) =	15
Uncontrolled PM/PM10/PM2.5 Emission Factor (wt. %) (8) =	12%
Uncontrolled PM/PM10/PM2.5 PTE (tpy) (9) =	15,768
Control Efficiency (wt. %) (6) =	99.9%
Controlled PM/PM10/PM2.5 PTE (tpy) (7) =	16

TABLE 4.2

PROPOSED MODIFICATIONS AND DETAILED EMISSIONS CALCULATIONS  
 ALERIS RECYCLING, INC.  
 WABASH, INDIANA

Paved Roads:

Maximum Trip Rate (trip/hr) (19) =	4
Estimated Trip Distance at Facility (mile/trip) (10) =	0.3
Maximum Hourly VMT (mi/hr) (11) =	1.2
PM Particle Size Multiplier (lb/VMT) [k] (12) =	0.011
PM10 Particle Size Multiplier (lb/VMT) [k] (12) =	0.0022
PM2.5 Particle Size Multiplier (lb/VMT) [k] (12) =	0.00054
Road Surface Silt Loading (g/m <sup>2</sup> ) [sL] (12) =	70
Average Weight of the Vehicles (tons) [W] (12) =	29
Number of Days with at Least 0.01 inch of Rain during Averaging Period (days) [P] (12) =	125
Number of Days in Averaging Period (days) [N] (12) =	365
Uncontrolled PM Emission Factor (lb/VMT) [Eext] (12) =	15
Uncontrolled PM10 Emission Factor (lb/VMT) [Eext] (12) =	3.0
Uncontrolled PM2.5 Emission Factor (lb/VMT) [Eext] (12) =	0.7
Uncontrolled PM PTE (tpy) (13) =	78
Uncontrolled PM10 PTE (tpy) (13) =	16
Uncontrolled PM2.5 PTE (tpy) (13) =	4
Control Efficiency (wt. %) (14) =	50%
Controlled PM PTE (tpy) (7) =	39
Controlled PM10 PTE (tpy) (7) =	7.8
Controlled PM2.5 PTE (tpy) (7) =	1.9

TABLE 4.2  
 PROPOSED MODIFICATIONS AND DETAILED EMISSIONS CALCULATIONS  
 ALERIS RECYCLING, INC.  
 WABASH, INDIANA

All Emissions Units - HAP PTE:

Control Device ID:	MB1	MB2	MB3	MB4		
Emissions Unit ID:	RMUA	GF, T, C1-C8	MS, S1, C9 - C11	CM, S2, C12 - C14	Paved Roads	
Uncontrolled PM (tpy) =	0.040	21,024	21,024	21,024	78	
Controlled PM PTE (tpy) =	1.2E-05	21	16	16	39	
Conservative Alloy Content of PM (wt. %) (15) =	5%	5%	5%	5%	5%	
Cadmium Compound Avg. Concentration in Product (16) =	0.0001%	0.0001%	0.0001%	0.0001%	0.0001%	
Chromium Compounds Avg. Concentration in Product (16) =	0.0502%	0.0502%	0.0502%	0.0502%	0.0502%	
Lead Compounds Avg. Concentration in Product (16) =	0.0731%	0.0731%	0.0731%	0.0731%	0.0731%	
Manganese Compounds Avg. Concentration in Product (16) =	0.212%	0.212%	0.212%	0.212%	0.212%	
Nickel Compounds Avg. Concentration in Product (16) =	0.1019%	0.1019%	0.1019%	0.1019%	0.1019%	
						<b>Totals</b>
Uncontrolled Cadmium Compound Emissions (tpy) (17) =	2.0E-09	1.1E-03	1.1E-03	1.1E-03	3.9E-06	3.2E-03
Uncontrolled Chromium Compound Emissions (tpy) (17) =	9.9E-07	5.3E-01	5.3E-01	5.3E-01	2.0E-03	1.6E+00
Uncontrolled Lead Compound Emissions (tpy) (17) =	1.4E-06	7.7E-01	7.7E-01	7.7E-01	2.9E-03	2.3E+00
Uncontrolled Manganese Compound Emissions (tpy) (17) =	4.2E-06	2.2E+00	2.2E+00	2.2E+00	8.3E-03	6.7E+00
Uncontrolled Nickel Compound Emissions (tpy) (17) =	2.0E-06	1.1E+00	1.1E+00	1.1E+00	4.0E-03	3.2E+00
Total (tpy) =	8.7E-06	4.6	4.6	4.6	1.7E-02	1.4E+01
Controlled Cadmium Compound Emissions (tpy) (17) =	5.9E-13	1.1E-06	7.9E-07	7.9E-07	2.0E-06	4.6E-06
Controlled Chromium Compound Emissions (tpy) (17) =	3.0E-10	5.3E-04	4.0E-04	4.0E-04	9.8E-04	2.3E-03
Controlled Lead Compound Emissions (tpy) (17) =	4.3E-10	7.7E-04	5.8E-04	5.8E-04	1.4E-03	3.4E-03
Controlled Manganese Compound Emissions (tpy) (17) =	1.3E-09	2.2E-03	1.7E-03	1.7E-03	4.2E-03	9.7E-03
Controlled Nickel Compound Emissions (tpy) (17) =	6.1E-10	1.1E-03	8.0E-04	8.0E-04	2.0E-03	4.7E-03
Total (tpy) =	2.6E-09	4.6E-03	3.4E-03	3.4E-03	8.6E-03	2.0E-02

TABLE 4.2

PROPOSED MODIFICATIONS AND DETAILED EMISSIONS CALCULATIONS  
ALERIS RECYCLING, INC.  
WABASH, INDIANA

Notes:

- (1) Max. Amount Unloaded (lb/day) = Max. No. of Truck Deliveries (truck/day) x Avg. Truck Load Size (lb/truck)
- (2) Max. Amount Unloaded (ton/hr) = Max. Amount Unloaded (lb/day) / 8 hr/day / 2,000 lb/ton
- (3) These parameters came from AP-42 Chapter 13.2.4 (Nov. 2006) for aggregate handling and storage piles. The emission factor [E] was calculated using the Equation 1 in AP-42 Chapter 13.2.4, as follows:  

$$E = k \times (0.0032) \times [(U/5)^{1.3} / (M/2)^{1.4}]$$
 Assumed a wind speed of 1.3 mph since the truck unloading occurs within the building, and assumed a moisture content of 4.8%.
- (4) Uncontrolled PM/PM10/PM2.5 PTE (tpy) = Max. Amount Unloaded (ton/hr) x Emission Factor (lb/ton) [E] x 8,760 hr/yr / 2,000 lb/ton
- (5) Conservatively assumed a capture efficiency of 30% from the raw material unloading area on the east end of the Milling Operation Building.
- (6) The baghouse control efficiencies for MB1, MB2, MB3, and MB4 are 99.9% by mass based on the Donaldson Product Specification Sheets provided in Appendix B for the two possible bag materials to be used.
- (7) Controlled PM/PM10/PM2.5 PTE (tpy) = Uncontrolled PM/PM10/PM2.5 PTE (tpy) x (100 wt. % - Control Efficiency (wt. %))
- (8) 12 percent by weight of the raw material input will become dust that goes to a baghouse based on engineering estimates previously used at Aleris Specification Alloys, Inc. located in Wabash, Indiana.
- (9) Uncontrolled PM/PM10/PM2.5 PTE (tpy) = Maximum Throughput (ton/hr) x Uncontrolled PM/PM10/PM2.5 Emission Factor (wt. %) x 8,760 hr/yr
- (10) The trip distance around the facility for unloading raw material was estimated using Google Earth.
- (11) Maximum Hourly VMT (mi/hr) = Maximum Trip Rate (trip/hr) x Estimated Trip Distance at Facility (mile/trip)
- (12) These parameters came from AP-42 Chapter 13.2.1 (Jan. 2011) for paved roads. The emission factor [E] was calculated using the Equation 2 in AP-42 Chapter 13.2.1, as follows:  

$$E_{ext} = (k \times sL^{0.91} \times W^{1.02}) \times (1 - P/4N)$$
 Assumed that the silt loading was similar to the silt loading at a sand and gravel processing facility.
- (13) Uncontrolled PM/PM10 PTE (tpy) = Maximum Hourly VMT (mi/hr) x Uncontrolled PM/PM10 Emission Factor (lb/VMT) [E<sub>ext</sub>] x 8,760 hr/yr / 2,000 lb/ton
- (14) Assumed a control efficiency of 50% due to the implementation of a Fugitive PM Emissions Plan.
- (15) Based on process knowledge, the alloy content of the PM ranges from 2 to 5%.
- (16) The average concentrations in product (wt. %) came from data derived from Oracle Query for Products by Location per the SARA/TRI spreadsheet for reporting year 2010.
- (17) Uncontrolled/Controlled HAP PTE (tpy) = Uncontrolled/Controlled PM PTE (tpy) x Conservative Alloy Content of PM (wt. %) x Avg. HAP Concentration in Product (wt. %)
- (18) Fugitive PM/PM10/PM2.5 PTE (tpy) = Uncontrolled PM/PM10/PM2.5 PTE (tpy) x (100 wt. % - Capture Efficiency (wt. %))
- (19) These values are based on process knowledge and engineering estimates. Used a maximum throughput of 20 ton/hr for the uncontrolled PTE calculations, and used a maximum throughput of 15 ton/hr for the controlled PTE calculations for MB3 and MB4 per discussions at the application meeting at IDEM on 8/10/11.

TABLE 4.2

PROPOSED MODIFICATIONS AND DETAILED EMISSIONS CALCULATIONS  
ALERIS RECYCLING, INC.  
WABASH, INDIANA

Abbreviations/Acronyms:

C# - Conveyor

CM - Cage Mill

g/m<sup>2</sup> - grams per square meter

GF - Grizzly Feeder

HAP - Hazardous Air Pollutant

lb/hr - pounds per hour

lb/ton - pounds emitted per tons processed

lb/VMT - pounds per vehicle mile traveled

MB# - Baghouse

MS - Mega Siam

PM - Particulate Matter

PM<sub>10</sub> - Particulate Matter with a diameter less than or equal to 10 micrometersPM<sub>2.5</sub> - Particulate Matter with a diameter less than or equal to 2.5 micrometers

PTE - Potential to Emit

RMUA - Raw Material Unloading Area

S# - Screen

S-MB# - Stack

T - Tumbler

ton/hr - tons per hour

tpy - tons per year

VMT - vehicle mile traveled

wt. % - percent by weight

### Affidavit of Construction

I, Phillip Brown, being duly sworn upon my oath, depose and say:

(Name of the Authorized Representative)

1. I live in Wabash 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 Plant Manager for Aleris Recycling, Inc.  
(Title) (Company Name)
3. By virtue of my position with Aleris Recycling, Inc., I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of Aleris Recycling, Inc.  
(Company Name)
4. I, the undersigned, have submitted an interim significant permit revision petition to the Office of Air Quality for the construction of a modified milling operation with baghouses as air pollution control.
5. Aleris Recycling, Inc. recognizes the following risks:  
(Company Name)  
(a) own financial risk, (b) that IDEM may require additional or different control technology for the final approval, (c) that IDEM may deny issuance of the final approval, and  
(d) any additional air permitting requirements.

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: Phillip Brown  
 Printed Name: PHILLIP BROWN  
 Phone No.: (260) 569-8282  
 Date: August 11, 2011

STATE OF INDIANA)

COUNTY OF Wabash )

Subscribed and sworn to me, a notary public in and for Wabash County and

State of Indiana on this 11 day of August, 2011.

My Commission expires: 5/18/2015

Signature: Joy Parson  
 Printed Name: Joy Parson

→ Submitted to Wabash Plain Dealer for publication on Tuesday, August 16<sup>th</sup>. Proof of publication will be submitted to IDEM OAQ under separate cover.

**NOTICE OF 14-DAY PERIOD  
FOR PUBLIC COMMENT**

Proposed Approval of Interim Significant Permit Revision  
for **Aleris Recycling, Inc.**  
in **Wabash County**

Notice is hereby given that the above company located at 305 Dimension Avenue, Wabash, Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct a modified milling operation with baghouses as air pollution control. Based on 8,760 hours per year of operation, the PM, PM10, and PM2.5 emissions are 63,151, 63,089, and 63,077 tons per year, respectively. *The PM, PM10, and PM2.5 emissions will be limited to less than 100 tons per year.*

The company has submitted an application for a significant permit revision. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the **Wabash Carnegie Public Library, 188 West Hill Street, Indiana, 46992**. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 or (317) 233-0178.

Company Official's Signature:

Phillip Brown

Company Official's Printed Name:

Phillip Brown

Company Name:

Aleris Recycling, Inc.



**CONESTOGA-ROVERS  
& ASSOCIATES**

6520 Corporate Drive, Indianapolis, Indiana 46278  
Telephone: 317-291-7007 Facsimile: 317-328-2666  
www.CRAworld.com

August 29, 2011

Reference No. 072883

IDEM Air Permits Administration  
ATTN: Incoming Application  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, IN 46204-2251

VIA HAND DELIVERY

To Whom It May Concern:

Re: Proof of Publication Notice  
Aleris Recycling, Inc.  
Wabash, Indiana  
FESOP No. F169-26165-00035

On behalf of Aleris Recycling, Inc. (Aleris), Conestoga-Rovers & Associates is pleased to submit the enclosed proof of publication notice associated with an interim petition package that was hand delivered to the Indiana Department of Environmental Management (IDEM) on August 12, 2011. The notice was published in the Wabash Plain Dealer on August 16, 2011. Thank you in advance for your attention to this matter.

If you have any questions, please contact me at (317) 291-7024.

Sincerely,

CONESTOGA-ROVERS & ASSOCIATES

Matthew D. Thomas, P.E.

MDT/br/01  
Encl.

cc: J. Buckert; Aleris  
P. Brown; Aleris



Equal  
Employment  
Opportunity Employer

REGISTERED COMPANY 702  
**ISO 9001**  
ENGINEERING DESIGN

Central Indiana Newspaper Group Advertising  
 Phone: 1-800-955-7888



MATTHEW D. THOMAS, P.E.  
 CONESTOGA-ROVERS & ASSOCIATES (CRA)/LEGAL  
 6520 CORPORATE DRIVE  
 INDIANAPOLIS, IN 46278  
 (317)291-7024

*Class Liner Ad #80087740 Summary:*  
 Ad Description: WPD- Aleris Recycling  
 Size: 2.00 x 7.11  
 Lines: 64

Total Cost \$150.80  
 Amount Paid \$0.00  
 Amount Due ~~\$150.80~~ PAID

**Order Detail:**

Publication	Start	Stop	Insertions
2054 Wabash Plain Dealer	8/16/11	8/16/11	1
8054 Wabash Plain Dealer Web	8/16/11	8/16/11	1

**NOTICE OF 14-DAY PERIOD FOR PUBLIC COMMENT**  
 Proposed Approval of Interim Significant Permit Revision for Aleris Recycling, Inc. in Wabash County

Notice is hereby given that the above company located at 305 Dimension Avenue, Wabash, Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct a modified milling operation with baghouses as air pollution control. Based on 8,760 hours per year of operation, the PM, PM10, and PM2.5 emissions are 63,151, 63,089, and 63,077 tons per year, respectively. The PM, PM10, and PM2.5 emissions will be limited to less than 100 tons per year.

The company has submitted an application for a significant permit revision. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the Wabash Carnegie Public Library, 188 West Hill Street, Indiana, 46992. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 or (317) 233-0178.

Company Official's Name: Phillip Brown  
 Company Name: Aleris Recycling, Inc.  
 August 16, 2011



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Archie Haney  
Aleris Recycling, Inc.  
305 Dimension Ave  
Wabash, IN 46992

**DATE:** September 8, 2011

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

**SUBJECT:** Final Decision  
FESOP - Interim Significant Permit Revision  
169 - 30783I - 00035

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:  
Phillip Brown, Plant Mgr  
Matt Thomas Conestoga-Rovers & Associates  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	LPOGOST 9/8/2011 Aleris Recvcling, Inc. 169 - 30783I - 00035 final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		Archie Haney Aleris Recycling, Inc. 305 Dimension Ave Wabash IN 46992 (Source CAATS) Via confirmed delivery										
2		Phillip Brown Plant Mgr Aleris Recycling, Inc. 305 Dimension Ave Wabash IN 46992 (RO CAATS)										
3		Ms. Lamonie Silvers 30056 South 100 West Wabash IN 46992 (Affected Party)										
4		Ms. Lynn A. Yohe 63 East Hill Street Wabash IN 46992 (Affected Party)										
5		Mr. Larry C. Thrush One North Wabash Wabash IN 46992 (Affected Party)										
6		Mr. Jerry M. Ault 3441 South 100 west Wabash IN 46992 (Affected Party)										
7		Mr. John Forrester 1400 S. Wabash St Wabash IN 46992 (Affected Party)										
8		Mr. William E. Hunter 55 West Market Wabash IN 46992 (Affected Party)										
9		Mr. Donald R. Mertz 99 West Canal Street Wabash IN 46992 (Affected Party)										
10		Mr. Michael W. Elward 1300 South Wabash Street Wabash IN 46992 (Affected Party)										
11		Wabash County Commissioners 1 West Hill Street Wabash IN 46992 (Local Official)										
12		Wabash City Council and Mayors Office 202 South Wabash Street Wabash IN 46992 (Local Official)										
13		Wabash County Health Department 89 W. Hill, Memorial Hall Wabash IN 46992-3184 (Health Department)										
14		Ted Little Wabash County Council 1076 West 900 North North Manchester IN 46962 (Affected Party)										
15		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										

Total number of pieces Listed by Sender	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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> 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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# Mail Code 61-53

IDEM Staff	LPOGOST 9/8/2011 Aleris Recvcling, Inc. 30783 (draft/final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		Matt Conestoga-Rovers & Associates 6520 Corporate Drive Indianapolis IN 46278 (Consultant)										
2												
3												
4												
5												
6												
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8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> 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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