



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: May 15, 2012

RE: JP Metals, LLC / 089-31091-00560

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**

**JP Metals, LLC
2230 Indianapolis Blvd
Whiting, Indiana 46394**

(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.

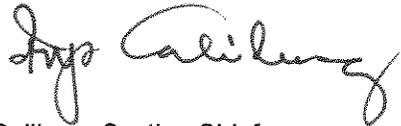
Operation Permit No.: M 089-31091-00560	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 15, 2012 Expiration Date: May 15, 2017

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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 source that separates zinc and zinc oxide from zinc dross and skimmed recycle material.

Source Address:	2230 Indianapolis Blvd, Whiting, Indiana 46394
General Source Phone Number:	(708) 205-5712
SIC Code:	5093 (Scrap and Waste Materials)
County Location:	Lake
Source Location Status:	Nonattainment for PM2.5 standard 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) zinc-zinc oxide sizing and sorting process, identified as Unit 1, constructed in 2010, with a maximum throughput of 2,000 pounds per hour of zinc dross or zinc skimmings, using one (1) Arrestall AV-2400 dust collector for PM control, and exhausting to stack V1, consisting of the following units:
 - (1) One (1) hopper, with a maximum throughput of 2,000 pounds per hour of zinc dross or zinc skimmings;
 - (2) One (1) crushing/hammer mill; receiving materials via enclosed conveyor from the hopper, with a maximum throughput of 2,000 pounds per hour;
 - (3) One (1) shaker/screener, with two (2) decks and a throughput of 2,000 pounds per hour of zinc dross or zinc skimmings;
 - (4) One (1) Separator, consisting of two (2) storage containers of zinc and zinc oxide;
- (b) One (1) material storage area inside the building, storing drums, bags, and barrels, with the maximum throughput of 350 tons.
- (c) Activities related to routine fabrication, maintenance, and repair; lubrication, including hand-held spray cans lubrication, dipping metal parts into lubrication oil, and manual or automated addition of cutting oil in machining operations.
- (d) Two (2) folk-lift trucks.
- (e) Paved roads 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, M 089-31091-00560, 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 M 089-31091-00560 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 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.2 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 twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

The Permittee shall not operate an incinerator 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.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Fugitive Particulate Matter Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) Material processing facilities shall include the following:
 - (1) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
 - (2) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (3) The PM₁₀ stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (4) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.
 - (5) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).
- (i) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (j) Material transfer limits shall be as follows:
 - (1) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

- (2) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.
- (3) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
 - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
 - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

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) zinc-zinc oxide sizing and sorting process, identified as Unit 1, constructed in 2010, with a maximum throughput of 2,000 pounds per hour of zinc dross or zinc skimmings, using one (1) Arrestall AV-2400 dust collector for PM control, and exhausting to stack V1, consisting of following units:
 - (1) One (1) hopper, with a maximum throughput of 2,000 pounds per hour of zinc dross or zinc skimmings;
 - (2) One (1) crushing/hammer mill; receiving materials via enclosed conveyor from the hopper, with a maximum throughput of 2,000 pounds per hour;
 - (3) One (1) shaker/screener, with two (2) decks and a throughput of 2,000 pounds per hour of zinc dross or zinc skimmings;
 - (4) One (1) Separator, consisting of two (2) storage containers of zinc and zinc oxide;
- (b) One (1) material storage area inside the building, storing drums, bags, and barrels, with the maximum throughput of 350 tons.
- (c) Activities related to routine fabrication, maintenance, and repair; lubrication, including hand-held spray cans lubrication, dipping metal parts into lubrication oil, and manual or automated addition of cutting oil in machining operations.
- (d) Two (2) folk-lift trucks.
- (e) Paved roads and parking lots with public access.

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

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

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6.8-1]

Pursuant to 326 IAC 6.8-1-2, the PM from the zinc-zinc oxide sizing and sorting process shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and any control devices. 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.1.3 Lead Emissions

Pursuant to Air-014-NPD and in order to verify the MSOP status of the source, the Permittee shall perform a one-time performance test to verify the lead emissions (before control) from the zinc-zinc oxide sizing and sorting process, identified as Unit-1, not later than 60 days after achieving maximum capacity but not later than 180 days after initial start up, utilizing methods as approved

by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.4 Particulate Control

In order to comply with Condition D.1.1, the Arrestall AV-2400 dust collector for particulate control shall be in operation and control emissions from the zinc-zinc oxide sizing and sorting process at all times when the process is in operation.

Compliance Monitoring Requirements

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse stack exhaust V1 shall be performed once per day during normal daylight operations, when the zinc-zinc oxide sizing and sorting process is exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee or contractor is a person who has worked or trained at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the baghouse stack exhausts, when exhausting to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).

- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the recordkeeping requirements of this requirement.

**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:	JP Metals, LLC
Address:	2230 Indianapolis Blvd
City:	Whiting, Indiana 46394
Phone #:	(708) 205-5712
MSOP #:	M 089-31091-00560

I hereby certify that JP Metals, LLC is:

still in operation.

no longer in operation.

I hereby certify that JP Metals, LLC is:

in compliance with the requirements of MSOP M 089-31091-00560.

not in compliance with the requirements of MSOP M 089-31091-00560.

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:

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

JP Metals, LLC
2230 Indianapolis Blvd
Whiting, Indiana 46394

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 JP Metals, LLC 2230 Indianapolis Blvd, Whiting, Indiana 46394, completed construction of a source that separates zinc and zinc oxide from zinc dross and skimmed recycle material on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on November 2, 2011 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M089-31091-00560, Plant ID No. 089-00560 issued on _____.
5. Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

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

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

Source Background and Description

Source Name:	JP Metals, LLC
Source Location:	2230 Indianapolis Boulevard, Whiting, Indiana 46394
County:	Lake County
SIC Code:	5093 (Scrap and Waste Materials)
Operation Permit No.:	M 089-31091-00560
Permit Reviewer:	Renee Traivaranon

On April 10, 2012, the Office of Air Quality (OAQ) had a notice published in the Times in Munster & the Post Tribune in Merrillville, Indiana, stating that JP Metals, LLC, had applied for a new source construction to separate zinc and zinc oxide from zinc dross and skimmed waste material. 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.

Comments and Responses

On April 10, 2012, the source submitted comments to IDEM, OAQ on the draft MSOP No. 089-31091-00560.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

The source has indicated that 100% of the materials will be recycle, either sold to zinc galvanizing or agricultural industries, therefore, the operation should state that these are recycle material.

Response to Comment 1:

IDEM, OAQ, has revised Section A.1 General Information and Affidavit of Construction to replace the word "waste" with "recycle" as follows:

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 source that separates zinc and zinc oxide from zinc dross and skimmed ~~waste~~ **recycle** material.

.....
JP Metals, LLC
2230 Indianapolis Blvd
Whiting, Indiana 46394

Affidavit of Construction

4. I hereby certify that JP Metals, LLC 2230 Indianapolis Blvd, Whiting, Indiana 46394, completed construction of a source that separates zinc and zinc oxide from zinc dross and skimmed ~~waste~~ **recycle** material on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on November 2, 2011 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M089-31091-00560, Plant ID No. 089-00560 issued on

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) Lake County has been re-classified as unclassifiable or attainment for PM2.5 standard, therefore, Source Location Status in Section A.1 has been revised as follows:

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

.....

Source Location Status: ~~Nonattainment for PM2.5 standard~~
Attainment for all ~~other~~ criteria pollutants

IDEM Contact

- (a) Questions regarding this MSOP can be directed to Ms. Renee Traivaranon 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) 234-5615 or toll free at 1-800-451-6027 extension 4-5615
- (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

**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:	JP Metals, LLC
Source Location:	2230 Indianapolis Boulevard, Whiting, Indiana 46394
County:	Lake County
SIC Code:	5093 (Scrap and Waste Materials)
Operation Permit No.:	M 089-31091-00560
Permit Reviewer:	Renee Traivaranon

On November 2, 2011, the Office of Air Quality (OAQ) received an application from JP Metals, LLC relating to a construction and operation of a new source that separates zinc and zinc oxide from zinc dross and skimmed waste material. These materials are sold to zinc galvanizing and agricultural industries.

Source Definition

- (a) Whiting Metals Company is located at 2230 Indianapolis Boulevard, Whiting, Indiana 46394. (Plant ID 089-00262).
- (b) JP Metals LLC is located at 2230 Indianapolis Blvd, Whiting, Indiana 46394. (Plant ID 089-00560).

Whiting Metals Company operates a secondary nonferrous metals plant (source number 089-00262) and is leasing a part of its property to JP Metals, LLC (source number 089-00560). JP Metals has applied to IDEM to construct and operate a plant to separate zinc from zinc dross and skimmed waste material. Two other companies already operate on Whiting Metals' property, Jacobs Engineering and AMVETS, but those operations have no regulated air emission units. IDEM, OAQ has examined whether the Whiting Metals plant and the JP Metals plant are part of the same source. The term "source" is defined at 326 IAC 1-2-73. In order for two plants to be considered one source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and
- (3) the plants must be located on contiguous or adjacent properties.

IDEM's Nonrule Policy Document Air-005 applies to the definition of "major source" in 326 IAC 2-7-1(22), which is a nearly identical to the definition of "source". It is therefore helpful in applying the definition of "source". Air-005 states that if two plants have common corporate officers or if one entity has ownership of fifty-one percent (51%) or more of both plants, then common ownership exists. JP Metals and Whiting Metals have separate owners with no common owner. There are no common corporate officers or board of directors between the two companies. Therefore, there is no common ownership.

IDEM's Nonrule Policy Document Air-005 also sets out two independent tests to determine if common control exists. The first test, the auxiliary activity test, determines whether one source performs an auxiliary activity which directly serves the purpose of the primary activity and whether the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity. An auxiliary activity directly serves the purpose of a primary activity by supplying a necessary raw material to

the primary activity or performing an integral part of the production process for the primary activity.

Day-to-day control of the auxiliary activity by the primary activity may be evidenced by several factors, including:

- is a majority of the output of the auxiliary activity provided to the primary activity?
- can the auxiliary activity contract to provide its products/services to a third-party without the consent of the primary activity?
- can the primary activity assume control of the auxiliary activity under certain circumstances?
- is the auxiliary activity required to submit periodic reports to the primary activity?

If one or a combination of these questions is answered affirmatively, common control may exist.

Neither plant will perform any auxiliary activity for the other plant. Both plants are free to enter into contracts with other companies. Neither company has the power to assume control of the other under any circumstances. Neither plant is required to submit any reports to the other. IDEM finds that neither plant has a major role in the day to day operation of the other plant. Therefore the first common control test is not met for the two plants.

The second common control test in the nonrule policy is the but/for test. This test focuses on whether the auxiliary activity would exist absent the needs of the primary activity. If all or a majority of the output of the auxiliary activity is consumed by the primary activity the but/for test is satisfied. Neither plant supplies any of its output to the other plant. If either plant were to shut down, the other plant would continue operating. Therefore the second common control test is also not met. IDEM finds that the plants are not under common control. Since neither common ownership nor common control exists the first part of the definition of source is not met.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The JP Metals plant claims the four SIC Code 5093 for Scrap and Waste Materials. However, IDEM finds that JP Metals has the four-digit SIC Code 3314 for the Secondary Smelting and Refining of Nonferrous Metals, which includes zinc dust recovery. This gives JP Metals a two-digit SIC Code of 33. The Whiting Metals plant also has the two-digit SIC Code 33 for the Major Group Primary Metal Industries. Therefore, the two plants have the same two-digit SIC Code.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. Neither plant will send any of its output to the other plant. Therefore, there is no support facility relationship. However, since the plants have the same two-digit SIC Code, the plants meet the second part of the source definition.

The plants are located on the same property, so the third part of the definition is met. However, since the plants do not meet all three parts of the source definition, IDEM, OAQ has determined that the JP Metals plant and the Whiting Metals plant are not part of the same source.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Attainment effective May 11, 2010, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3. Basic nonattainment designation effective federally 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. Lake 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}**
 U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Lake County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) 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.
- (b) 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.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by JP Metals, LLC on November 2, 2011, relating to the construction and operation of a source that separates zinc and zinc oxide from zinc dross and skimmed waste material. The source has constructed the units but has not yet in operation until receiving this permit.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) zinc-zinc oxide sizing and sorting process, identified as Unit 1, constructed in 2010, with a maximum throughput of 2,000 pounds per hour of zinc dross or zinc skimmings, using one (1) Arrestall AV-2400 dust collector for PM control, and exhausting to stack V1, consisting of the following units:
 - (1) One (1) hopper, with a maximum throughput of 2,000 pounds per hour of zinc dross or zinc skimmings;
 - (2) One (1) crushing/hammer mill; receiving materials via enclosed conveyor from the hopper, with a maximum throughput of 2,000 pounds per hour;
 - (3) One (1) shaker/screener, with two (2) decks and a maximum throughput of 2,000 pounds per hour of zinc dross or zinc skimmings;
 - (4) One (1) Separator, consisting of two (2) storage containers of zinc and zinc oxide;

Note: All of the above units are controlled by one (1) Arrestall AV-2400 dust collector.
- (b) One (1) material storage area inside the building, storing drums, bags, and barrels, with the maximum throughput storage of 350 tons.
- (c) Activities related to routine fabrication, maintenance, and repair; lubrication, including hand-held spray cans lubrication, dipping metal parts into lubrication oil, and manual or automated addition of cutting oil in machining operations.
- (d) Two (2) folk-lift trucks.
- (e) Paved roads and parking lots with public access.

“Integral Part of the Process” Determination

The applicant has submitted information to justify that the air pollution control equipment Arrestall AV-2400 dust collector should be considered an integral part of the process. However, the information submitted was not sufficient to determine that the dust collector should be considered an integral part of the process.

Enforcement Issues

IDEM is aware that equipment has been constructed prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

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	32.5
PM10 ⁽¹⁾	32.4
PM2.5	32.4
SO ₂	--
NO _x	--
VOC	--
CO	--
Single HAP	0.3 (Lead)
Total HAPs	0.3
GHGs as CO ₂ e	--

(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".

Criteria Pollutants PM10, PM2.5, SO2, NOx, VOC, and CO

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of each PM, PM10 and PM2.5 is each less than one hundred (100) tons per year, but greater than 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.

HAPs

(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.

Greenhouse Gases (GHGs)

(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. (There is no GHGs emissions from this source). 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
Hopper Loading/ Conveying	13.75	13.75	13.75	--	--	--	--	--	0.14	0.14 (Lead)
Crushing/Hammer mill Shaker/Screener	18.62	18.62	18.62	--	--	--	--	--	0.19	0.19 (Lead)
Storage	negl	negl	negl	--	--	--	--	--	negl	negl (Lead)
Insignificant Activities	--	--	--	--	--	--	--	--	--	--
Paved/Unpaved Road	0.12	0.12	0.12	--	--	--	--	--	--	--
Total PTE of Entire Source	32.5	32.4	32.4	--	--	--	--	--	0.3	0.3
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	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 CO ₂ e 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.										

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Primary Zinc Smelters, 40 CFR 60, Subpart Q (326 IAC 12), are not included in the permit, since the operation at this source is only to separate zinc and zinc oxide and it does not engage in the production or process of zinc or zinc oxide from zinc sulfide ore concentrates through the use of pyrometallurgical techniques.
- (b) There are no other 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)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Primary Nonferrous Metals Area Sources—Zinc, Cadmium, and Beryllium, 40 CFR 63, Subpart GGGGGG (6G) (326 IAC 20), are not included in the permit, although this source is an area source but it is not considered a primary zinc production plant.
- (d) The requirements of National Emission Standards for Hazardous Air Pollutants for Secondary Nonferrous Metals Processing Area Sources—40 CFR 63, Subpart TTTTTT (6T), are not included in this source, although this source is an area source that engages in crushing and screening zinc and zinc oxide only and it does not engage in melting post-consumer nonferrous metal scrap to make products including bars, ingots, blocks, or metal powders as defined in §63.11472.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (f) 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.

It is conservatively estimated that the Lead emissions are less than 1% of the particulate emissions, which results to less than 10 tons per year, therefore, this source is considered MSOP under 326 IAC 2-6.1. Since this is considered an alternative emission factor and source specific emission rate and in order to verify the MSOP status of the source under 326 IAC 2-6.1, the source will be required to conduct a test to determine the Potential to Emit Lead from the zinc-zinc oxide sizing and sorting process.

(Note: Since Lead is considered HAP, the source will become major for HAP (Lead) if it is determined that the lead emissions of the entire are at least 30% of the particulate emissions.)

- (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 pollutants are less than 100 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-1.1-5 (PM2.5 nonattainment counties)
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM2.5), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (d) 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.
- (e) 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 located in Lake County, it has actual emissions of NO_x and VOC of less than twenty-five (25) tons per year, 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.

(Note: This evaluation is based on the emission factor provided by source. The source will be required to verify the Lead potential to emit. If the result of the test shows that the source emits Lead into the ambient air at the level equal to or greater than 5 tons per year, then the source will be required to submit an application to amend the permit to include the emission reporting requirement.)

- (f) 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 twenty percent (20%) 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.
- (g) 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.
- (h) 326 IAC 6.8-2
This source is not specifically listed in this rule, therefore, the requirements of 326 IAC 6.8-2 do not apply to this source.
- (i) 326 IAC 6.8-8-1 (Continuous Compliance Plan in Lake County)
This source is not specifically listed in this rule, therefore, the requirements of 326 IAC 6.8-8 do not apply to this source.
- (j) 326 IAC 6.8-10 (Fugitive Particulate Matter for Lake County)
The potential to emit of fugitive particulate matter of each facility at this source is less than five (5) tons per year, therefore, the 326 IAC 6.8-10 requirements do not apply.
- (k) 326 IAC 6.8-11-1 (Particulate Matter Contingency Measures)
The requirements of the 326 IAC 6.8-11-1 do not apply to this source, because of the following conditions:
- (1) This source is not specifically listed in 326 IAC 6.8-2.
 - (2) The fugitive particulate emissions to which 326 IAC 6.8-10-1(a) does not apply.
 - (3) This source is not identified by the department in a culpability study as causing or contributing to an exceedance or violation of the PM10 standard.
 - (4) The potential PM10 emissions are less than ten (10) tons per year.

Zinc and zinc oxide sizing and sorting process

- (a) 326 IAC 6.8-1-2 (Particulate Matter Emission Limitations)
This source is subject to 326 IAC 6.8-1-2 because it is not specific listed in 326 IAC 6.8-1-2, subsection (c) and (d) and not limited by subsection (b), (e), (f) or (g).

Pursuant to 326 IAC 6.8-1-2, the PM from the zinc-zinc oxide sizing and sorting process shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from this source is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (c) There are no other 326 IAC 8 Rules that are applicable to the process.

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

Compliance Determination, Monitoring and Testing Requirements

- (a) The PTE before control is greater than 25 tons per year, and the dust collector is required for zinc-zinc oxide sizing and sorting process, therefore, the compliance monitoring is required for the source.

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

Emission Unit/Control	Operating Parameters	Frequency
zinc-zinc oxide sizing and sorting process/Cartridge Dust Collector	Visible emissions notations	once per day
zinc-zinc oxide sizing and sorting process/Cartridge Dust Collector	Broken or Failed Bag Detection	As indicated in PMP

- (b) The source provided the emission factor for Lead. This EF is considered the alternative EF for lead.

Pursuant to Air-014-NPD and in order to verify compliance with MSOP requirements, the Permittee shall perform a one-time performance test to verify the lead emission factor from the zinc-zinc oxide sizing and sorting process, identified as Unit-1, not later than 60 days after achieving maximum capacity but not later than 180 days after initial start up, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

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 November 2, 2011 and additional information was received on December 6, 2011 and March 6, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 089-31091-00560. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Renee Traivaranon 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) 234-5615 or toll free at 1-800-451-6027 extension 4-5615.
- (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

**Appendix A: Emissions Calculations
Emission Summary**

Company Name: JP Metals
Address City IN Zip: 2300 Indianapolis Boulevard, Whiting, Indiana
Permit Number: M 089-31091-00560
Reviewer: Renee Traivaranon
Date: January 12, 2012

Potential Emissions (tons/year)										
Operation/Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Single HAP	Combined HAPs
Loading-Conveying/hopper	13.75	13.75	13.75	-	-	-	-	-	1.4E-01	1.4E-01
Crushing/Hammer mill Shaker/Screenner	18.62	18.62	18.62	-	-	-	-	-	1.9E-01	1.9E-01
Paved/unpaved Road	0.12	0.03	0.00	-	-	-	-	-	-	-
Total	32.5	32.4	32.4	0.0	0.0	0.0	0.0	0.0	3.2E-01	3.2E-01

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**Air Emissions Calculations
Hopper Loading/Conveying**

Company Name: JP Metals
Address City IN Zip: 2300 Indianapolis Boulevard, Whiting, Indiana
Permit Number: M 089-31091-00560
Reviewer: Renee Traivaranon
Date: January 12, 2012

Maximum throughput for loading= 1 ton/hr			
Activity Rate volume processed in tons/hr	1.00		
Hours per day used in calculations =	24		
Days per year used in calculations =	365		
Emission Factor (EF) loading/conveying PM =	3.14	lb/ton	From AP-42 Ch. 11.12 table 11.12-2 for Cement supplement unloading
Emission Factor (EF) loading/conveying Lead =	0.0314	lb/ton	It is assumed that 1% of PM is Lead ⁽¹⁾
ER = overall emission reduction efficiency, %	90		This is a conservative controlled efficiency %.

Uncontrolled Emissions

Where: $E = ((A \times EF)/2000) \times 24 \times 365$
 E = Emissions (tons/yr)
 A = Activity Rate (tons/hr)
 EF = emission factor (lb/ton)
 2000 = conversion of lbs to tons
 24 = hours per day of operation conservative basis for calculation
 365 = days per year of operation, conservative basis for calculation

	A	EF	lb/ton	hr/day	days/yr	=	
Loading/Conveying: Lead	1.00	x 0.0314	/ 2000	x 24	x 365	=	0.138 tons/yr
Loading/Conveying: PM	1.00	x 3.140	/ 2000	x 24	x 365	=	13.7532 tons/yr

Controlled Emissions

Where: $E = ((A \times EF)/2000) \times (1-ER/100) \times 24 \times 365$
 E = Emissions (tons/yr)
 A = Activity Rate (tons/hr)
 EF = emission factor (lb/ton)
 ER = overall emission reduction efficiency, %
 2000 = conversion of lbs to tons
 24 = hours per day of operation conservative basis for calculation
 365 = days per year of operation, conservative basis for calculation

	A	EF	lb/ton	ER	hr/day	days/yr	=	
Loading/Conveying: Lead	1.00	x 0.0314	/ 2000	x 0.1	x 24	x 365	=	0.01375 tons/yr
Loading/Conveying: PM	1.00	x 3.14	/ 2000	x 0.1	x 24	x 365	=	1.37532 tons/yr

Methodology:

PTE of PM or Lead (tons/yr) = Emission Factor (lb/ton) * Maximum throughput (ton) * (ton/2000 lbs) * (24 hours/day) * (365 days/yr)
 PTE of PM or Lead (tons/yr) after Control = Emission Factor (lb/ton) * Maximum throughput (ton) * (ton/2000 lbs) * (24 hours/day) * (365 days/yr) * (1-Controlled Efficiency/100)
 Assumption PM=PM10=PM2.5

⁽¹⁾Emission factor for Lead is provided by source and it is considered alternative EF; therefore, the company is required to conduct testing to confirm this alternative EF.

**Air Emissions Calculations
Crushing/Screening Operation**

Company Name: JP Metals
Address City IN Zip: 2300 Indianapolis Boulevard, Whiting, Indiana
Permit Number: M 089-31091-00560
Reviewer: Renee Traivaranon
Date: January 12, 2012

Maximum throughput for source = 1 ton/hr
 Activity Rate volume processed in tons/hr 1.00
 Hours per day used in calculations = 24
 Days per year used in calculations = 365
 Emission Factor (EF) crushing/screening PM = 4.25 lb/ton From AP-42 Ch. 12.14.3 table 12.14-4 for crushing/screening operations
 Emission Factor (EF) crushing/screening Lead = 0.0425 lb/ton It is assumed that 1% of PM is Lead.⁽¹⁾
 ER = overall emission reduction efficiency, % 90 This is a conservative controlled efficiency %.

Uncontrolled Emissions

$E = ((A \times EF) / 2000) \times 24 \times 365$
 Where: E = Emissions (tons/yr)
 A = Activity Rate (tons/hr)
 EF = emission factor (lb/ton)
 2000 = conversion of lbs to tons
 24 = hours per day of operation conservative basis for calculation
 365 = days per year of operation, conservative basis for calculation

	A	EF	lb/ton	hr/day	days/yr		
Crushing/screening: Lead	1.00	x	0.0425	/	2000	x	24 x 365 = 0.18615 tons/yr
Crushing/screening: PM	1.00	x	4.25	/	2000	x	24 x 365 = 18.615 tons/yr

Controlled Emissions

$E = ((A \times EF) / 2000) \times (1 - ER / 100) \times 24 \times 365$
 Where: E = Emissions (tons/yr)
 A = Activity Rate (tons/hr)
 EF = emission factor (lb/ton)
 ER = overall emission reduction efficiency, %
 2000 = conversion of lbs to tons
 24 = hours per day of operation conservative basis for calculation
 365 = days per year of operation, conservative basis for calculation

	A	EF	lb/ton	ER	hr/day	days/yr	
Crushing/screening: Lead	1.00	x	0.0425	/	2000	x	0.1 x 24 x 365 = 0.01862 tons/yr
Crushing/screening: PM	1.00	x	4.25	/	2000	x	0.1 x 24 x 365 = 1.8615 tons/yr

Methodology:

PTE of PM or Lead (tons/yr) = Emission Factor (lb/ton) * Maximum throughput (ton) * (ton/2000 lbs) * (24 hours/day) * (365 days/yr)
 PTE of PM or Lead (tons/yr) after Control = Emission Factor (lb/ton) * Maximum throughput (ton) * (ton/2000 lbs) * (24 hours/day) * (365 days/yr) * (1 - Controlled Efficiency/100)
 Assumption PM=PM10=PM2.5

⁽¹⁾Emission factor for Lead is provided by source and it is considered alternative EF; therefore, the company is required to conduct testing to confirm this alternative EF.

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

Company Name: JP Metals
Address City IN Zip: 3300 Indianapolis Boulevard, Whiting, IN
Permit Number: M 089-31091-00560
Reviewer: Renee Traivaranon
Date: January 12, 2012

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	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)	0.143	1.000	0.143	1.000	22.000	700.000	0.133	0.019	6.920
Vehicle (leaving plant) (one-way trip)	0.143	1.000	0.143	1.000	21.000	700.000	0.133	0.019	6.920
			0.000		0.000		0.000	0.000	0.000
			0.000		0.000		0.000	0.000	0.000
Totals			0.286		43.000			0.038	13.840

Average Vehicle Weight Per Trip = $\frac{150.3}{0.13}$ tons/trip
Average Miles Per Trip = $\frac{150.3}{0.13}$ miles/trip

Unmitigated Emission Factor, $E_f = k[(s/12)^a][W/3]^b$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	150.3	150.3	150.3	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = E_f [(365 - P)/365]$
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	15.02	3.83	0.38	lb/mile
Mitigated Emission Factor, $E_{ext} =$	9.88	2.52	0.25	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

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)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.052	0.013	0.001	0.034	0.009	0.001	0.017	0.004	0.000
Vehicle (leaving plant) (one-way trip)	0.052	0.013	0.001	0.034	0.009	0.001	0.017	0.004	0.000
	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Totals	0.104	0.026	0.003	0.068	0.017	0.002	0.034	0.009	0.001

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 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

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

Company Name: JP Metals
Source Address: 3300 Indianapolis Boulevard, Whiting, In
Permit Number: M 089-31091-00560
Reviewer: Renee Traivaranon
Date: January 12, 2012

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)	0.142	1.000	0.142	22.000	3.124	700	0.133	0.0	6.9
Vehicle (leaving plant) (one-way trip)	0.142	1.000	0.142	21.000	2.982	700	0.133	0.0	6.9
Totals			0.284		6.106			0.038	13.743

Average Vehicle Weight Per Trip = $\frac{21.5}{0.13}$ tons/trip
 Average Miles Per Trip = $\frac{0.13}{0.13}$ miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (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 =	21.5	21.5	21.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

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

Mitigated Emission Factor, Eext = $\frac{Ef * [1 - (p/4N)]}{N}$
 where p = $\frac{125}{365}$ 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, Ef =	1.988	0.398	0.0976	lb/mile
Mitigated Emission Factor, Eext =	1.818	0.364	0.0892	lb/mile
Dust Control Efficiency =	50%	50%	50%	

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)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.01	0.0014	0.0003	0.0062	0.0012	0.0003	0.0031	0.0006	0.0002
Vehicle (leaving plant) (one-way trip)	0.01	0.0014	0.0003	0.0062	0.0012	0.0003	0.0031	0.0006	0.0002
Totals	0.01	0.0027	0.0007	0.0125	0.0025	0.0006	0.0062	0.0012	0.0003

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 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Thomas W. Easterly
Commissioner

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

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

TO: Jeffrey Palmer
JP Metals, LLC
2230 Indianapolis Blvd
Whiting, IN 46934

DATE: May 15, 2012

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

SUBJECT: Final Decision
MSOP
089-31091-00560

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:
Mark Elliot (MH Environmental, Inc)
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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May 15, 2012

TO: Whiting Public Library

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

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

Applicant Name: JP Metals, LLC
Permit Number: 089-31091-00560

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

Mail Code 61-53

IDEM Staff	MIDENNEY 5/15/2012 JP Metals LLC 089-31091-00560 (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		Jeffrey S Palmer JP Metals LLC 2230 Indianapolis Blvd Whiting IN 46934 (Source CAATS) via confirm delivery										
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
6		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
7		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
8		Whiting City Council and Mayors Office 1143 119th St Whiting IN 46394 (Local Official)										
9		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
10		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
11		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
12		Whiting Public Library 1735 Oliver St Whiting IN 46394-1794 (Library)										
13		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
14		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
15		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										

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IDEM Staff	MIDENNEY 5/15/2012 JP Metals LLC 089-31091-00560 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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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		Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
2		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
3		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
4		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
5		Ron Novak Hammond Dept. of Environmental Management 5925 Calumnet Ave. Hammond IN 46320 (Local Official)										
6		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
7		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)										
8		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)										
9		Mark H Elliott MHEEnvironmental, Inc. 2016 N Cleveland 1S Chicago IL 60614 (Consultant)										
10												
11												
12												
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14												
15												

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