



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant
DATE: September 4, 2013
RE: Metal X LLC / 033-33107-00102
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.dot 6/13/13



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Michael R. Pence
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Commissioner

**New Source Construction and
Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**MetalX, LLC
295 S. Commerce Drive
Waterloo, Indiana 46793**

(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.: M033-33107-00102	
Issued by:  Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 4, 2013 Expiration Date: September 4, 2018

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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 scrap metal shredding and separation source.

Source Address:	295 S. Commerce Drive, Waterloo, Indiana 46793
General Source Phone Number:	260-232-3000
SIC Code:	5093 (Scrap and Waste Materials)
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

The source consists of the following existing emission units:

- (a) One (1) vehicle/metal Wendt Shredder, identified as Model 60, constructed in 2013, with a maximum capacity of 60 tons/hr, using an integral water spray injection system as fire/explosion suppression and particulate control, and exhausting to ambient air outdoors.
- (b) One (1) scrap metal separation line, constructed in 2013, with a maximum capacity of 60 tons per hour, and exhausting to the atmosphere. The line includes the following equipment:
 - (1) One (1) Scrap metal infeed conveyor, with a maximum capacity of 60 tons per hour;
 - (2) Three (3) oscillator transfer points, with a maximum capacity of 60 tons per hour of wet metal scrap.
 - (3) Six (6) conveyor transfer points, each with a maximum capacity of 60 tons per hour.
 - (4) Two (2) drum magnet transfers, each with a maximum capacity of 60 tons per hour.
 - (5) Two (2) conveyor transfer points, each with a maximum capacity of 30 tons per hour
 - (6) Six (6) conveyor transfer points, each with a maximum capacity of 15 tons per hour of wet auto shredder residue
 - (7) One (1) trommel drum, with a maximum capacity of 15 tons per hour

- (8) Four (4) conveyor transfer points, each with a maximum capacity of 7.5 tons per hour of wet auto shredder residue
 - (9) Two (2) drum magnet transfers, each with a maximum capacity of 7.5 tons per hour of wet auto shredder residue
 - (10) Two (2) oscillator transfer points, each with a maximum capacity of 7.5 tons per hour of wet auto shredder residue
 - (11) Three (3) conveyor transfer points, each with a maximum capacity of 5 tons per hour of wet auto shredder residue
 - (12) One (1) Z-box separator, with a maximum capacity of 60 tons per hour of metal scrap, separating heavy materials from light materials using a counter-flow forced air stream cascade system, equipped with a cyclone particle separator with the cyclone exhaust recirculated internally within the Z-box separator and reused for the forced air stream cascade system. To minimize leakage of air from the Z-box separator, the input chamber is equipped with a hanging curtain and a material activated revolving gate, the heavy material outlet chute is equipped with a hanging curtain, and the cyclone particle collection hopper is equipped with a rotary air lock mechanism.
- (c) One (1) torch cutting operation, utilizing no control devices, exhausting to the ambient atmosphere, and consisting of:
- (1) Six (6) oxypropane torches.
- (d) One (1) Baler, identified as the Harris Baler, constructed in 2012, used to bale copper wire, aluminum siding, and aluminum-copper radiators, with a maximum capacity of 16,000 lbs/hr, utilizing no control devices, and exhausting indoors.
- (e) Scrap metal storage piles, loading and unloading of scrap metal storage piles, and loading of trucks with processed scrap metal;
- (f) Paved roads and parking lots with public access;

SECTION B GENERAL CONDITIONS

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

Terms in this 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 described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue 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, M033-33107-00102, 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 M033-33107-00102 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

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

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

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) vehicle/metal Wendt Shredder, identified as Model 60, constructed in 2013, with a maximum capacity of 60 tons/hr, using an integral water spray injection system as fire/explosion suppression and particulate control, and exhausting to ambient air outdoors.
- (b) One (1) scrap metal separation line, constructed in 2013, with a maximum capacity of 60 tons per hour, and exhausting to the atmosphere. The line includes the following equipment:
 - (1) One (1) Scrap metal infeed conveyor, with a maximum capacity of 60 tons per hour;
 - (2) Three (3) oscillator transfer points, with a maximum capacity of 60 tons per hour of wet metal scrap.
 - (3) Six (6) conveyor transfer points, each with a maximum capacity of 60 tons per hour.
 - (4) Two (2) drum magnet transfers, each with a maximum capacity of 60 tons per hour.
 - (5) Two (2) conveyor transfer points, each with a maximum capacity of 30 tons per hour
 - (6) Six (6) conveyor transfer points, each with a maximum capacity of 15 tons per hour of wet auto shredder residue
 - (7) One (1) trommel drum, with a maximum capacity of 15 tons per hour
 - (8) Four (4) conveyor transfer points, each with a maximum capacity of 7.5 tons per hour of wet auto shredder residue
 - (9) Two (2) drum magnet transfers, each with a maximum capacity of 7.5 tons per hour of wet auto shredder residue
 - (10) Two (2) oscillator transfer points, each with a maximum capacity of 7.5 tons per hour of wet auto shredder residue
 - (11) Three (3) conveyor transfer points, each with a maximum capacity of 5 tons per hour of wet auto shredder residue
 - (12) One (1) Z-box separator, with a maximum capacity of 60 tons per hour of metal scrap, separating heavy materials from light materials using a counter-flow forced air stream cascade system, equipped with a cyclone particle separator with the cyclone exhaust recirculated internally within the Z-box separator and reused for the forced air stream cascade system. To minimize leakage of air from the Z-box separator, the input chamber is equipped with a hanging curtain and a material activated revolving gate, the heavy material

outlet chute is equipped with a hanging curtain, and the cyclone particle collection hopper is equipped with a rotary air lock mechanism.

- (c) One (1) torch cutting operation, utilizing no control devices, exhausting to the ambient atmosphere, and consisting of:
 - (1) Six (6) oxypropane torches.
- (d) One (1) Baler, identified as the Harris Baler, constructed in 2012, used to bale copper wire, aluminum siding, and aluminum-copper radiators, with a maximum capacity of 16,000 lbs/hr, utilizing no control devices, and exhausting indoors.
- (e) Scrap metal storage piles, loading and unloading of scrap metal storage piles, and loading of trucks with processed scrap metal;
- (f) Paved roads and parking lots with public access;

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

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

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

In order to render the requirements of 326 IAC 8-1-6 not applicable, the vehicle/metal Wendt Shredder shall be limited as follows:

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

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

D.1.2 Particulate Matter Limitations [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), particulate matter (PM) emissions from the facilities listed in the table below, 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).

Emission Unit Descriptions
One (1) vehicle/metal Wendt Shredder
Twenty One (21) conveyors, five (5) oscillators, Four (4) drum magnets, and one (1) trommel drum comprising the conveying system
One (1) Z-box separator
One (1) Baler
Six (6) Oxypropane torches, comprising the torch cutting operation

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

A Preventive Maintenance Plan is required for these facilities and any associated 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.1.4 Particulate Matter (PM)

In order to ensure compliance with Condition D.1.1, the integral water spray injection system shall be in operation and control emissions from the vehicle/metal Wendt Shredder at all times that the vehicle/metal Wendt Shredder is in operation.

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

D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain the following records:
- (1) The material throughput to the vehicle/metal Wendt Shredder each month and each compliance period;
 - (2) Records that VOC and VHAP containing fluids have been drained and removed (to the extent practicable) from vehicles, appliances, industrial machinery, and other scrap metal received by the Permittee prior to shredding; and
 - (3) If the Permittee did not drain and remove VOC and VHAP containing fluids on-site, records of the inspections performed to confirm the non-existence of VOC and VHAP containing fluids in vehicles, appliances, industrial machinery, and other metal scrap received by the Permittee prior to shredding.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee’s obligations with regard to the records required by this condition.

D.1.6 Reporting Requirements

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

Indiana Department of Environmental Management Office of Air Quality Compliance and Enforcement Branch

MSOP Quarterly Report

Source Name: MetalX, LLC
Source Address: 295 S. Commerce Drive, Waterloo, Indiana 46793
MSOP Permit No.: M033-33107-00102
Facility: Vehicle/Metal Wendt Shredder
Parameter: Material Throughput
Limit: The material throughput to the vehicle/metal Wendt Shredder shall not exceed 199,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

**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:	MetalX, LLC
Address:	295 S. Commerce Drive
City:	Waterloo, Indiana 46793
Phone #:	260-232-3000
MSOP #:	M033-33107-00102

I hereby certify that MetalX, LLC is :

still in operation.

no longer in operation.

I hereby certify that MetalX, LLC is :

in compliance with the requirements of MSOP M033-33107-00102.

not in compliance with the requirements of MSOP M033-33107-00102.

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

MetalX, LLC
295 S. Commerce Drive
Waterloo, Indiana 46793

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 MetalX, LLC 295 S. Commerce Drive, Waterloo, Indiana 46793, has constructed and will operate a scrap metal shredding and separation source in conformity with the requirements and intent of the permit application received by the Office of Air Quality on April 22, 2013 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M033-33107-00102, Plant ID No. 033-00102 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** 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: _____.

Name _____ Signature _____
(typed or printed)

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

Technical Support Document (TSD) for a Registration Transitioning to a
Minor Source Operating Permit (MSOP) with New Source Review

Source Description and Location

Source Name: MetalX, LLC
Source Location: 295 S. Commerce Drive, Waterloo, IN, 46793
County: DeKalb
SIC Code: 5093 (Scrap and Waste Materials)
Operation Permit No.: M033-33107-00102
Permit Reviewer: Nida Habeeb

On April 22, 2013, the Office of Air Quality (OAQ) received an application from MetalX, LLC related to the construction and operation of new emission units at an existing stationary scrap metal shredding and separation source and transition from a Registration to a MSOP.

Existing Approvals

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

- (a) Registration No. R033-26687-00102, issued on September 24, 2008.
- (b) Registration Notice-Only Change No. 033-27056-00102, issued on November 12, 2008.
- (c) Registration Notice-Only Change No. 033-31159-00102, issued on December 22, 2011.

Due to this application, the source is transitioning from a Registration to a MSOP.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. DeKalb 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) DeKalb County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Other Criteria Pollutants
DeKalb County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of (Permitted Emission Units)

The Office of Air Quality (OAQ) has reviewed an application, submitted by MetalX LLC on April 22, 2013, related to the construction and operation of new emission units at an existing stationary scrap metal shredding and separation facility and transition from a Registration to a MSOP.

The source consists of the following permitted emission units:

- (a) One (1) torch cutting operation, utilizing no control devices, exhausting to the ambient atmosphere, and consisting of:
 - (1) Six (6) oxypropane torches.
- (b) One (1) Baler, identified as the Harris Baler, constructed in 2012, used to bale copper wire, aluminum siding, and aluminum-copper radiators, with a maximum capacity of 16,000 lbs/hr, utilizing no control devices, and exhausting indoors.
- (c) Scrap metal storage piles, loading and unloading of scrap metal storage piles, and loading of trucks with processed scrap metal;
- (d) Paved roads and parking lots with public access;

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission unit(s):

- (a) One (1) vehicle/metal Wendt Shredder, identified as Model 60, constructed in 2013, with a maximum capacity of 60 tons/hr, using an integral water spray injection system as fire/explosion suppression and particulate control, and exhausting to ambient air outdoors.
- (b) One (1) scrap metal separation line, constructed in 2013, with a maximum capacity of 60 tons per hour, and exhausting to the atmosphere. The line includes the following equipment:

- (1) One (1) Scrap metal infeed conveyor, with a maximum capacity of 60 tons per hour;
- (2) Three (3) oscillator transfer points, with a maximum capacity of 60 tons per hour of wet metal scrap.
- (3) Six (6) conveyor transfer points, each with a maximum capacity of 60 tons per hour.
- (4) Two (2) drum magnet transfers, each with a maximum capacity of 60 tons per hour.
- (5) Two (2) conveyor transfer points, each with a maximum capacity of 30 tons per hour
- (6) Six (6) conveyor transfer points, each with a maximum capacity of 15 tons per hour of wet auto shredder residue
- (7) One (1) trommel drum, with a maximum capacity of 15 tons per hour
- (8) Four (4) conveyor transfer points, each with a maximum capacity of 7.5 tons per hour of wet auto shredder residue
- (9) Two (2) drum magnet transfers, each with a maximum capacity of 7.5 tons per hour of wet auto shredder residue
- (10) Two (2) oscillator transfer points, each with a maximum capacity of 7.5 tons per hour of wet auto shredder residue
- (11) Three (3) conveyor transfer points, each with a maximum capacity of 5 tons per hour of wet auto shredder residue
- (12) One (1) Z-box separator, with a maximum capacity of 60 tons per hour of metal scrap, separating heavy materials from light materials using a counter-flow forced air stream cascade system, equipped with a cyclone particle separator with the cyclone exhaust recirculated internally within the Z-box separator and reused for the forced air stream cascade system. To minimize leakage of air from the Z-box separator, the input chamber is equipped with a hanging curtain and a material activated revolving gate, the heavy material outlet chute is equipped with a hanging curtain, and the cyclone particle collection hopper is equipped with a rotary air lock mechanism.

Removed Emission Units and Pollution Control Equipment

- (a) One (1) scrap metal shredder, approved for construction in 2008, with a maximum capacity of 80 tons per hour, using a water/foam spray system deemed an integral part of the shredding process for particulate matter control and fire/explosion prevention, and exhausting to the atmosphere. The scrap metal shredder will process scrap metal consisting of demolition structural steel, automobile bodies, and other types of metals.

“Integral Part of the Process” Determination

- (a) MetalX LLC, Inc submitted the following information to justify why the water spray injection system should be considered an integral part of the vehicle/metal Wendt Shredder:

- (1) The material inputs to the metal shredder consist primarily of crushed and uncrushed vehicle/metal bodies. These vehicle bodies typically contain flammable liquids and flammable solids. The high speed shearing action of the cutters on the metal shredder creates high instantaneous temperatures and sparks. The simultaneous presence of flammable materials and ignition sources may result in fires and explosions within the machinery. In order to prevent this, water sprays are directed at the metal shredder's material input chute, cutterhead and materials output chute, thereby thoroughly wetting the material before, during and after it is shredded. This wetting process both prevents explosions within the machinery and extinguishes any materials that ignite. Although the water spray injection system has the effect of reducing air pollutant emissions, the primary role for the water spray injection system is to maintain safe operating conditions so the equipment can run without risk of malfunction or fire/explosion.

IDEM, OAQ has evaluated the information submitted and agrees that the water spray injection system should be considered an integral part of the vehicle/metal Wendt Shredder. This determination is based on the fact that the primary role for the water spray injection system is to maintain safe operating conditions so the equipment can run without risk of malfunction or fire/explosion. Therefore, the permitting level will be determined using the potential to emit after the water spray injection system. Operating conditions in the proposed permit will specify that this water spray injection system shall operate at all times when the vehicle/metal Wendt Shredder is in operation.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated 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	11.88
PM10 ⁽¹⁾	8.03
PM2.5	7.29
SO ₂	0
NO _x	0
VOC	65.70
CO	0
GHGs as CO ₂ e	0

- (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) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Hexane	0.98
Benzene	0.50
MIBK	0.07
Trichloroethene	0.05
Toluene	2.19
Ethylbenzene	0.51
m,p-Xylenes	1.79
Styrene	0.22
o-Xylene	0.66
Cumene	0.05
Napthalene	0.04
Isooctane	1.40
Cadmium	0.00
Chromium	0.00
Lead	0.00
TOTAL HAPs	8.50

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Wendt Shredder	0.26	0.26	0.26	0.00	0.00	24.90	0.00	0.00	8.48	2.19 (Toluene)
Conveyor Transfer Points/Separation Line	1.34	0.47	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Z-Box separator***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Torch Cutting	6.17	6.17	6.17	0.00	0.00	0.00	0.00	0.00	0.02	0.00
Baler****	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paved Roads	3.69	0.72	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	11.46	7.61	6.87	0.00	0.00	24.90	0.00	0.00	8.50	2.19 (Toluene)
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
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each 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 *** The Z-box separator is a closed-loop system with no external exhaust point. Therefore emissions are expected to be negligible. **** The PTE Emissions from the Baler are expected to be negligible.										

In order to render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable, the source shall comply with the following:

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

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard (NSPS) for Metallic Mineral Processing Plants, 40 CFR 60, Subpart LL (326 IAC 12), are not included in the permit since the source does not meet the definition of a metallic mineral processing plant, as defined in 40 CFR 60.381. The source operates a metal recycling facility and does not produce metallic mineral concentrates from ore.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (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, are not included in the permit, since this source is not a primary zinc production facility or primary beryllium production facility. The source is a metal recycling facility.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Nonferrous Metals Processing Area Sources, 40 CFR 63, Subpart TTTTTT, are not included in the permit, since the source does not engage in secondary nonferrous metals processing as defined in 40 CFR 63.11472.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit since the source is not primarily engaged in operations which are classified in one of the nine source categories listed in 40 CFR 63.11514(a)(1) through (9).
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (g) 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 (Entire Source)

The following state rules are applicable to the source:

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

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The requirements of 326 IAC 6-5 are not applicable to the source because it does not have the potential to emit fugitive particulate matter emissions greater than twenty-five (25) tons per year or more.

State Rule Applicability Determination (Individual Facility)

Vehicle/Metal Shredding

- (a) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from the vehicle/metal Wendt Shredder, 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 vehicle/metal Wendt Shredder are greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from vehicle/metal Wendt Shredder to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

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

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

- (2) VOC emissions from the vehicle/metal Wendt Shredder shall not exceed 0.25 lbs/ton of material throughput.
- (3) The Permittee shall drain and remove (to the extent possible) VOC and VHAP containing fluids from vehicles, appliances, industrial machinery, and other metal scrap received by the Permittee prior to shredding; or the Permittee shall document that inspections have been performed to confirm the non-existence of VOC and VHAP containing fluids. Fluids shall include, but are not limited to, gasoline, motor oil, antifreeze, transmission oil, brake oil, power steering fluid, hydraulic fluid, and differential fluid.

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

Conveyor System

- (c) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from each of the conveyors, oscillators, drum magnet transfer points, and trommel drum, comprising the conveying system, 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)).

Z-box Separator

- (d) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from the Z-box separator, 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)).

Baler

- (e) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from the baler, 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)).

Torch Cutting

- (f) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from each of the units comprising the torch cutting operation, 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)).
- (g) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

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

The integral water spray injection system shall be in operation and control emissions from the vehicle/metal Wendt Shredder at all times that the vehicle/metal Wendt Shredder is in operation.

- (b) There are no testing requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 22, 2013.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M033-33107-00102. 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 Nida Habeeb 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) 234-8531 or toll free at 1-800-451-6027 extension 4-8531.
- (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
Emissions Summary**

Company Name: MetalX, LLC
Address City IN Zip: 295 S. Commerce Drive, Waterloo, IN, 46793
Permit Number: 033-33107-00102
Plt ID: 033-00102
Reviewer: Nida Habeeb
Date: May 16, 2013

Unlimited Emissions (Tons/Yr)							
Pollutant	Wendt Shredder	Conveyor Transfer Points/Separation Line	Z-Box Separator**	Torch Cutting	Baler***	Paved Roads	Total
PM	0.68	1.34	Negl.	6.17	Negl.	3.69	11.88
PM10	0.68	0.47	Negl.	6.17	Negl.	0.72	8.03
PM2.5	0.68	0.34	Negl.	6.17	Negl.	0.11	7.29
VOC	65.70	-	-	-	-	-	65.70
NOx	-	-	-	-	-	-	0.00
SO2	-	-	-	-	-	-	0.00
CO	-	-	-	-	-	-	0.00
CO2e	-	-	-	-	-	-	0.00
Single HAP (Toluene)	2.19	-	-	-	-	-	2.19
Combined HAPs	8.48	-	-	0.02	-	-	8.50

Note:

*Wendt Shredder emissions based on 100% automobiles being shredded. The unlimited potential to emit PM/PM10/PM2.5 is after the integral water sprays.

** The Z-box Separator is a closed-loop system with no external exhaust point. Therefore emissions are expected to be negligible.

*** The PTE emissions from the Baler are expected to be negligible.

Negl. = negligible

Limited Emissions (Tons/Yr)							
Pollutant	Wendt Shredder	Conveyor Transfer Points/Separation Line	Z-Box Separator***	Torch Cutting	Baler****	Paved Roads	Total
PM**	0.26	1.34	Negl.	6.17	Negl.	3.69	11.46
PM10**	0.26	0.47	Negl.	6.17	Negl.	0.72	7.61
PM2.5**	0.26	0.34	Negl.	6.17	Negl.	0.11	6.87
VOC*	24.90	-	-	-	-	-	24.90
NOx	-	-	-	-	-	-	0.00
SO2	-	-	-	-	-	-	0.00
CO	-	-	-	-	-	-	0.00
CO2e	-	-	-	-	-	-	0.00
Single HAP (Toluene)**	2.19	-	-	-	-	-	2.19
Combined HAPs**	8.48	-	-	0.02	-	-	8.50

Note:

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

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

*** The Z-box Separator is a closed-loop system with no external exhaust point. Therefore emissions are expected to be negligible.

**** The PTE Emissions from the Baler are expected to be negligible

Negl. = negligible

**Appendix A: Emissions Calculations
Uncontrolled Wendt Metal Shredder Emissions**

Company Name: MetalX, LLC
Address City IN Zip: 295 S. Commerce Drive, Waterloo, IN, 46793
Permit Number: 033-33107-00102
PIN ID: 033-00102
Reviewer: Nida Habeeb
Date: May 16, 2013

Particulate Emissions

Process Description	Maximum Capacity (tons/hr)	Particulate Emission Factor (lbs/ton)	PTE of PM/PM10/PM2.5	
			(lb/hr)	(tons/yr)
Wendt Shredder	60	0.00257	0.1542	0.68

Note:
Material is wetted with an integral smart water injection system to minimize explosion and fire hazards.
The particulate emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.F for dry milling of an 75% Auto & 25% Scrap throughput mixture.
The ISRI, Inc's "Title V Applicability Workbook" Appendix D, Table D-10.F emission factor is higher than the factor determined through the stack testing performed at Capital City Metals, LLC in Indianapolis on February 8, 2005, where the vehicle/metal shredder at that facility was utilizing a Smart Water Injection system.
Assumed PM = PM10 = PM2.5

Methodology:

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

VOC Emissions

Process Description	Maximum Capacity (tons/hr)	VOC Emission Factor		Auto PTE of VOC		Sheet PTE of VOC	
		(lbs/ton)	(tons/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Wendt Shredder	60	0.25	0.14	15.00	65.70	8.40	36.79

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

Methodology:

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

HAP Emissions (Auto Shredding)	Maximum Capacity (tons/hr)	Organic HAPs											Metal HAPs			Polychlorinated Biphenyls	
		Hexane (lbs/ton)	Benzene (lbs/ton)	MIBK (lbs/ton)	Trichloroethene (lbs/ton)	Toluene (lbs/ton)	Ethylbenzene (lbs/ton)	m,p-Xylenes (lbs/ton)	Styrene (lbs/ton)	o-Xylene (lbs/ton)	Cumene (lbs/ton)	Naphthalene (lbs/ton)	Isocane (lbs/ton)	Cadmium (lbs/ton)	Chromium (lbs/ton)	Lead (lbs/ton)	PCB's (lbs/ton)
Wendt Shredder	60	0.0037	0.0019	0.0002	0.0002	0.0083	0.0019	0.0068	0.0009	0.0025	0.0002	0.0001	0.00531	0.00000116	0.00000128	0.00000789	0.0000873
		Hexane (tons/yr)	Benzene (tons/yr)	MIBK (tons/yr)	Trichloroethene (tons/yr)	Toluene (tons/yr)	Ethylbenzene (tons/yr)	m,p-Xylenes (tons/yr)	Styrene (tons/yr)	o-Xylene (tons/yr)	Cumene (tons/yr)	Naphthalene (tons/yr)	Isocane (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Lead (tons/yr)	PCB's (tons/yr)
		0.98	0.50	0.07	0.05	2.19	0.51	1.79	0.22	0.66	0.05	0.04	1.40	0.00	0.00	0.00	0.02
Combined HAPs:																	8.48

HAP Emissions (Sheet Shredding)	Maximum Capacity (tons/hr)	Organic HAPs																
		Chloromethane (lbs/ton)	1,3 Butadiene (lbs/ton)	Acrolein (lbs/ton)	Dichloroethene (lbs/ton)	Hexane (lbs/ton)	Benzene (lbs/ton)	Trichloroethene (lbs/ton)	Methyl Methacrylate (lbs/ton)	MIBK (lbs/ton)	Toluene (lbs/ton)	Ethylbenzene (lbs/ton)	m,p-Xylenes (lbs/ton)	Styrene (lbs/ton)	o-Xylene (lbs/ton)	Cumene (lbs/ton)	1,4 Dichlorobenzene (lbs/ton)	Naphthalene (lbs/ton)
Wendt Shredder	60	0.00002	0.00002	0.00002	0.00005	0.00076	0.00024	0.00003	0.00006	0.00056	0.00240	0.00074	0.00263	0.00039	0.00104	0.00010	0.00002	0.00020
		Chloromethane (tons/yr)	1,3 Butadiene (tons/yr)	Acrolein (tons/yr)	Dichloroethene (tons/yr)	Hexane (tons/yr)	Benzene (tons/yr)	Trichloroethene (tons/yr)	Methyl Methacrylate (tons/yr)	MIBK (tons/yr)	Toluene (tons/yr)	Ethylbenzene (tons/yr)	m,p-Xylenes (tons/yr)	Styrene (tons/yr)	o-Xylene (tons/yr)	Cumene (tons/yr)	1,4 Dichlorobenzene (tons/yr)	Naphthalene (tons/yr)
		0.00	0.01	0.01	0.01	0.20	0.06	0.01	0.02	0.15	0.63	0.19	0.69	0.10	0.27	0.03	0.01	0.05
Combined HAPs:																		2.44

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

Methodology:

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

Appendix A: Emissions Calculations
Limited Wendt Metal Shredder Emissions
 Company Name: **Metals, LLC**
 Address City IN Zip: **295 S. Commerce Drive, Waterloo, IN, 46793**
 Permit Number: **033-33107-00102**
 PH ID: **033-00102**
 Reviewer: **Nida Habeeb**
 Date: **May 16, 2013**

Particulate Emissions

Process Description	Limited Capacity (tons/yr)	Particulate Emission Factor (lbs/ton)	PTE of PM/PM10/PM2.5 (tons/yr)	
Wendt Shredder	199200	0.00257	0.058	0.26

Note:
 Material is wetted with an integral smart water injection system to minimize explosion and fire hazards.
 The particulate emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.F for dry milling of an 75% Auto & 25% Scrap throughput mixture.
 The ISRI, Inc's "Title V Applicability Workbook" Appendix D, Table D-10.F emission factor is higher than the factor determined through the stack testing performed at Capital City Metals, LLC in Indianapolis on February 8, 2005, where the vehicle/metal shredder at that facility was utilizing a Smart Water Injection system.
 Assumed PM = PM10 = PM2.5

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

VOC Emissions

Process Description	Limited Capacity (tons/yr)	VOC Emission Factor		Auto PTE of VOC		Sheet PTE of VOC	
		Auto (lbs/ton)	Sheet (lbs/ton)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Wendt Shredder	199200	0.25	0.14	5.685	24.90	3.184	13.944

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

Methodology:
 PTE of VOC (lb/hr) = Limited Capacity (tons/yr) * VOC Emission Factor (lbs/ton) / 8760 (hrs)
 PTE of VOC (ton/yr) = Limited Capacity (tons/yr) * VOC Emission Factor (lbs/ton) / 2,000 lbs.

HAP Emissions (Auto Shredding)		Organic HAPs												Metal HAPs			Polychlorinated Biphenyls
Process Description	Limited Capacity (tons/yr)	Hexane (lbs/ton)	Benzene (lbs/ton)	MIBK (lbs/ton)	Trichloroethene (lbs/ton)	Toluene (lbs/ton)	Ethylbenzene (lbs/ton)	m,p-Xylenes (lbs/ton)	Styrene (lbs/ton)	o-Xylene (lbs/ton)	Cumene (lbs/ton)	Naphthalene (lbs/ton)	Isocotane (lbs/ton)	Cadmium (lbs/ton)	Chromium (lbs/ton)	Lead (lbs/ton)	PCB's (lbs/ton)
Wendt Shredder	60	0.0037	0.0019	0.0002	0.0002	0.0083	0.0019	0.0068	0.0009	0.0025	0.0002	0.0001	0.00531	0.00000116	0.00000128	0.00000789	0.0000873
		0.98	0.50	0.07	0.05	2.19	0.51	1.79	0.22	0.66	0.05	0.04	1.40	0.00	0.00	0.00	0.02
Combined HAPs:																	8.48

HAP Emissions (Sheet Shredding)		Organic HAPs																	
Process Description	Limited Capacity (tons/yr)	Chloromethane (lbs/ton)	1,3 Butadiene (lbs/ton)	Acrolein (lbs/ton)	Dichloroethene (lbs/ton)	Hexane (lbs/ton)	Benzene (lbs/ton)	Trichloroethene (lbs/ton)	Methyl Methacrylate (lbs/ton)	MIBK (lbs/ton)	Toluene (lbs/ton)	Ethylbenzene (lbs/ton)	m,p-Xylenes (lbs/ton)	Styrene (lbs/ton)	o-Xylene (lbs/ton)	Cumene (lbs/ton)	1,4 Dichlorobenzene (lbs/ton)	Naphthalene (lbs/ton)	
Wendt Shredder	60	0.00002	0.00002	0.00002	0.00005	0.00076	0.00024	0.00003	0.00006	0.00056	0.00240	0.00374	0.00263	0.00039	0.00104	0.00010	0.00002	0.00020	
		4.84E-07	6.06E-07	6.73E-07	1.41E-06	2.29E-05	7.33E-06	8.47E-07	1.74E-06	1.68E-05	7.20E-05	2.22E-05	7.88E-05	1.16E-05	3.12E-05	3.02E-06	5.77E-07	5.97E-06	
Combined HAPs:																			0.00

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

Methodology:
 HAP Emissions (tons/yr) = Limited Capacity (tons/yr) * HAP (lbs/ton) / 2000 lbs

Appendix A: Emission Calculations
Uncontrolled Conveyor Transfer Points of Separation Line Emissions
PM, PM10, and PM2.5

Company Name: MetalX, LLC
 Address: 295 South Commerce Drive, Waterloo, IN 46793
 Permit Number: 033-33107-00102
 Pit ID: 033-00102
 Reviewer: Nida Habeeb
 Date: May 16, 2013

Potential to Emit PM, PM10 and PM2.5

The following calculations determine the amount of emissions created by the Scrap Metal Separation Line, based on 8,760 hours of operation.

Process Description	Number of Emission Points	Maximum Capacity (tons/hr)	PM Emission Factor (lbs/ton)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)	PM2.5 Emission Factor (lbs/ton)	PTE of PM2.5 (tons/year)
Scrap Metal Separation Line								
Infeed Conveyor**	1	60	3.00E-03	0.79	1.10E-03	0.29	1.10E-03	0.29
Oscillator Transfer Points # 1, #2, #3 - wet*	3	60	1.40E-04	0.11	4.60E-05	0.04	1.30E-05	0.01
Conveyor Transfer Point #1, #2, #3, #4, #5, #6 - wet*	6	60	1.40E-04	0.22	4.60E-05	0.07	1.30E-05	0.02
Drum Magnet Transfer Point #1, #2 - wet*	2	60	1.40E-04	0.07	4.60E-05	0.02	1.30E-05	0.01
Conveyor Transfer Point #7, #8 - wet*	2	30	1.40E-04	0.04	4.60E-05	0.01	1.30E-05	0.00
Conveyor Transfer Point #9, #10, #11, #12, #13, #14 wet*	6	15	1.40E-04	0.06	4.60E-05	0.02	1.30E-05	0.01
Trommel Drum #1- wet*	1	15	1.40E-04	0.01	4.60E-05	0.00	1.30E-05	0.00
Conveyor Transfer Point #15, #16, #17, #18- wet*	4	7.5	1.40E-04	0.02	4.60E-05	0.01	1.30E-05	0.00
Drum Magnet Transfer Point #3, #4 - wet*	2	7.5	1.40E-04	0.01	4.60E-05	0.00	1.30E-05	0.00
Oscillator Transfer Points #4, #5 - wet*	2	7.5	1.40E-04	0.01	4.60E-05	0.00	1.30E-05	0.00
Conveyor Transfer Point #19, #20, #21 - wet*	3	5	1.40E-04	0.01	4.60E-05	0.00	1.30E-05	0.00
Scrap Metal Separation Line Totals				1.34		0.47		0.34

Note:
 Emissions from conveying of metal scrap are calculated using emission factors for crushed stone conveyor transfer points from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04)
 * The water injection system on the vehicle/metal shredder is considered an integral control device. This system leaves the items in the downstream conveyors wet. Therefore controlled emission factors are used for these conveyor transfer points.
 **The infeed conveyor transfer point is a damp process. The emission factor for a dry process was used as a worst case.
 No emission factor is identified for PM2.5 for dry conveying, therefore it is assumed PM10 = PM2.5
 PTE of PM/PM10/PM2.5 (tons/year) = Number of Emission Points x Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hrs/year) x 1 ton/2000 lbs
 No emission factors exist for drum magnet transfer points or trommel drum transfer points. Therefore, PTE is conservatively calculated using the emission factors for crushed stone conveyor transfer points.

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

**Appendix A: Emission Calculations
Torch Cutting Emissions
PM, PM10, and PM2.5**

Company Name: MetalX, LLC
Address: 295 South Commerce Drive, Waterloo, IN 46793
Permit Number: 033-33107-00102
Pit ID: 033-00102
Reviewer: Nida Habeeb
Date: May 16, 2013

FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxypropane	6	12	4	0.0815	0.0002		0.0002	1.408	3.46E-03	0.00E+00	8.64E-04	0.004
EMISSION TOTALS												
Potential Emissions lbs/hr								1.41				0.0043
Potential Emissions lbs/day								33.80				0.10
Potential Emissions tons/year								6.17				0.0189

Methodology:

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations
Paved Roads Emissions Summary**

Company Name: MetalX, LLC
Address City IN Zip: 295 S. Commerce Drive, Waterloo, IN, 46793
Permit Number: 033-33107-00102
Plt ID: 033-00102
Reviewer: Nida Habeeb
Date: May 16, 2013

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, Chapter 13.2.1 (12/2003). Based on information provided by the source, truck entering and leaving the site will travel at speeds less than 10 miles per hour. As discussed in AP-42, Chapter 13.2.1, Paved Roads (12/2003), Equation 1 was developed from regression analysis of emission test data for vehicles travelling between 10 and 55 miles per hour. To account for the lower vehicle speed, potential particulate emissions from paved roads were calculated using AP-42, Chapter 13.2.1 Equation 1, assuming a road surface silt loading of 1.1 grams per square meter (g/m²) (minimum silt loading for paved roads at a municipal solid waste landfill, AP-42 Table 13.2.1-4).

Vehicle Information (provided by source)

Type	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)
Trucks (entering plant) (one-way trip)	85.30	22.5	1919.3	600	0.114	9.7	3538.0
Trucks (leaving plant) (one-way trip)	85.30	22.5	1919.3	600	0.114	9.7	3538.0
Total	170.6		3838.5			19.4	7076.0

Average Vehicle Weight Per Trip = $\frac{22.5}{85.30}$ tons/trip
 Average Miles Per Trip = $\frac{9.7}{85.30}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	22.5	22.5	22.5	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	1.1	1.1	1.1	g/m ² = road surface silt loading of paved roads (Table 13.2.1-4, assuming municipal solid waste landfill)

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

Mitigated Emission Factor, $E_{ext} = \frac{E_f * [1 - (p/4N)]}{N}$
 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, E_f =	1.14	0.22	0.03	lb/mile
Mitigated Emission Factor, E_{ext} =	1.04	0.20	0.03	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Trucks (entering plant) (one-way trip)	2.02	0.39	0.06	1.85	0.36	0.05
Trucks (leaving plant) (one-way trip)	2.02	0.39	0.06	1.85	0.36	0.05
Total	4.04	0.79	0.12	3.69	0.72	0.11

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 day (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 day (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)

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

TO: Ryan Nolte
Metal X, LLC
295 S Commerce Dr
Waterloo, IN 46793

DATE: September 4, 2013

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

SUBJECT: Final Decision
MSOP
033-33107-00102

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:
Daniel Rifkin, Responsible Official
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 6/13/2013

Mail Code 61-53

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2		Daniel Rifkin President MetalX LLC 295 S Commerce Dr Waterloo IN 46793 (RO CAATS)										
3		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 (Local Official)										
5		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
6		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
7		Dekalb County Health Department 220 E 7th St #110 Auburn IN 46706 (Health Department)										
8		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
9		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										
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11		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										
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13		Max Trubey PO Box 433 Waterloo IN 46793 (Affected Party)										
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