



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a  
Minor Source Operating Permit (MSOP)  
for SMS Shredding, LLC in St. Joseph County

MSOP Renewal No.: M141-37423-00577

The Indiana Department of Environmental Management (IDEM) has received an application from SMS Shredding, LLC located at 54450 Smilax Rd., New Carlisle, IN 46552 for a renewal of its MSOP issued on November 10, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow SMS Shredding, LLC to continue to operate its existing source.

This draft MSOP Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

New Carlisle Olive Township Library  
408 S. Bray  
New Carlisle, IN 46552

and

IDEM Northern Regional Office  
300 N. Michigan Street, Suite 450  
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M141-37423-00577 in all correspondence.

**Comments should be sent to:**

Tamera Wessel  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-8530  
Or dial directly: (317) 234-8530  
Fax: (317) 232-6749 attn: Tamera Wessel  
E-mail: [twessel@idem.IN.gov](mailto:twessel@idem.IN.gov)

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Tamera Wessel of my staff at the above address.



Jason R. Krawczyk, Section Chief  
Permits Branch  
Office of Air Quality



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**DRAFT**

**Carol S. Comer**  
Commissioner

## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**SMS Shredding, LLC  
54450 Smilax Rd.  
New Carlisle, Indiana 46552**

(herein known as the Permittee) is hereby authorized to 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 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M141-37423-00577	
Issued by:  Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>4</b>
A.1	General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
<b>SECTION B</b>	<b>GENERAL CONDITIONS .....</b>	<b>5</b>
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability	
B.5	Severability	
B.6	Property Rights or Exclusive Privilege	
B.7	Duty to Provide Information	
B.8	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.9	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.10	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.11	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.12	Permit Renewal [326 IAC 2-6.1-7]	
B.13	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.14	Source Modification Requirement	
B.15	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]	
B.16	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.17	Annual Fee Payment [326 IAC 2-1.1-7]	
B.18	Credible Evidence [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>10</b>
	<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].....</b>	<b>10</b>
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2][326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)] .....</b>	<b>12</b>
C.8	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11] .....</b>	<b>12</b>
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)].....</b>	<b>12</b>
C.10	Compliance Monitoring [326 IAC 2-1.1-11]	
C.11	Instrument Specifications [326 IAC 2-1.1-11]	
	<b>Corrective Actions and Response Steps.....</b>	<b>13</b>
C.12	Response to Excursions or Exceedances	
C.13	Actions Related to Noncompliance Demonstrated by a Stack Test	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)].....</b>	<b>14</b>
C.14	Malfunctions Report [326 IAC 1-6-2]	
C.15	General Record Keeping Requirements [326 IAC 2-6.1-5]	
C.16	General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]	

<b>SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS .....</b>	<b>16</b>
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].....</b>	<b>16</b>
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]	
D.1.2 Particulate Emission Limitations [326 IAC 6.5-1-2]	
D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]	
<b>Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)] .....</b>	<b>17</b>
D.1.4 Particulate Control	
<b>Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)].....</b>	<b>17</b>
D.1.5 Record Keeping Requirements	
D.1.6 Reporting Requirements	
<b>Quarterly Report.....</b>	<b>18</b>
<b>ANNUAL NOTIFICATION .....</b>	<b>19</b>
<b>MALFUNCTION REPORT .....</b>	<b>20</b>

## 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)]

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

Source Address:	54450 Smilax Rd., New Carlisle, Indiana 46552
General Source Phone Number:	574-654-7554
SIC Code:	5093 (Scrap and Waste Materials)
County Location:	St Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) 4000 HP DC electric vehicle/metal shredder, identified as EU-001, approved in 2011 for construction, with a maximum throughput capacity of 90 tons/hr, using an integral smart water injection system as fire/explosion suppression and particulate control, and exhausting to the ambient atmosphere.
- (b) One (1) conveyor system, identified as EU-002, approved in 2011 for construction, with a maximum throughput capacity of 90 tons/hr, consisting of:
  - (1) Six (6) wet conveyors; and
  - (2) One (1) dry conveyor.
- (c) One (1) automotive shredder residue sorting operation, identified as EU-003, permitted in 2016, with a maximum capacity of 9.0 tons per hour, and consisting of:
  - (1) One (1) metering hopper;
  - (2) One (1) cyclone and Z-box separator system;
  - (3) Three (3) induction sensor sorters; and
  - (4) Eight (8) conveyors.
- (d) Paved roadways and parking lots with public access.

## SECTION B GENERAL CONDITIONS

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

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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 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, M141-37423-00577, is issued for a fixed term of ten (10) 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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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.4 Enforceability

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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.5 Severability

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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.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

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- (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.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (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.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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.

- (c) 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.
- (d) 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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M141-37423-00577 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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.12 Permit Renewal [326 IAC 2-6.1-7]**

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

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- (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.14 Source Modification Requirement**

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

**B.15 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]**

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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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (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.17 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (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.18 Credible Evidence [326 IAC 1-1-6]**

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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 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.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]

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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]

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- (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]**

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- (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]**

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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]**

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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]**

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- (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. The analog instrument shall be capable of measuring values outside of the normal range.

- (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**

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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**

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- (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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**SECTION D.1**

**EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) One (1) 4000 HP DC electric vehicle/metal shredder, identified as EU-001, approved in 2011 for construction, with a maximum throughput capacity of 90 tons/hr, using an integral smart water injection system as fire/explosion suppression and particulate control, and exhausting to the ambient atmosphere.
- (b) One (1) conveyor system, identified as EU-002, approved in 2011 for construction, with a maximum throughput capacity of 90 tons/hr, consisting of:
  - (1) Six (6) wet conveyors; and
  - (2) One (1) dry conveyor.
- (c) One (1) automotive shredder residue sorting operation, identified as EU-003, permitted in 2016, with a maximum capacity of 9.0 tons per hour, and consisting of:
  - (1) One (1) metering hopper;
  - (2) One (1) cyclone and Z-box separator system;
  - (3) Three (3) induction sensor sorters; and
  - (4) Eight (8) conveyors.

(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 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

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

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

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

#### D.1.2 Particulate Emission Limitations [326 IAC 6.5-1-2]

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Pursuant to 326 IAC 6.5-1-2(a)(Particulate Matter Limitations Except Lake County), particulate matter emissions from each of the emissions units comprising EU-001, EU-002, and EU-003 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot(dscf).

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

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A Preventive Maintenance Plan is required for these emission units and 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 [326 IAC 2-6.1-5(a)(2)]**

#### D.1.4 Particulate Control

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

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

#### D.1.5 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain records of the material throughput to the vehicle/metal shredder each month and each compliance period.
- (b) To document the compliance status with Condition D.1.1(c) and if the Permittee did not drain and remove VOC and VHAP containing fluids on-site, the Permittee shall maintain 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,
- (c) 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

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A quarterly summary of the information to document the compliance status with Condition D.1.1(a) shall be submitted no later than thirty (30) days after the end of the quarter being reported using the reporting forms at the end of this permit or their equivalent. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**Quarterly Report**

Source Name: SMS Shredding, LLC  
Source Address: 54450 Smilax Rd., New Carlisle, Indiana 46552  
MSOP Permit No.: M141-37423-00577  
Source: Vehicle/Metal Shredder (EU-001)  
Pollutant: VOC  
Limit: The material throughput to the vehicle/metal shredder (EU-001) shall not exceed 199,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Material Throughput (tons)	Material Throughput (tons)	Material Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

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).

<b>Company Name:</b>	SMS Shredding, LLC
<b>Address:</b>	54450 Smilax Rd.
<b>City:</b>	New Carlisle, Indiana 46552
<b>Phone #:</b>	574-654-7554
<b>MSOP #:</b>	M141-37423-00577

I hereby certify that SMS Shredding, LLC is :

☐ still in operation.

☐ no longer in operation.

I hereby certify that SMS Shredding, LLC is :

☐ in compliance with the requirements of  
MSOP M141-37423-00577.

☐ not in compliance with the requirements of  
MSOP M141-37423-00577.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**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, SO<sub>2</sub>, 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:

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

Technical Support Document (TSD) for a  
Minor Source Operating Permit (MSOP) Renewal

<b>Source Background and Description</b>
------------------------------------------

<b>Source Name:</b> <b>Source Location:</b> <b>County:</b> <b>SIC Code:</b> <b>Permit Renewal No.:</b> <b>Permit Reviewer:</b>	<b>SMS Shredding, LLC</b> <b>54450 Smilax Rd., New Carlisle, IN 46552</b> <b>St. Joseph County</b> <b>5093 (Scrap and Waste Materials)</b> <b>M141-37423-00577</b> <b>Madhurima Moulik</b>
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The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from SMS Shredding, LLC, relating to the operation of a stationary vehicle and metal scrap shredding facility. On July 21, 2016, SMS Shredding, LLC submitted an application to the OAQ requesting to renew its operating permit. SMS Shredding, LLC, was issued its initial MSOP No. M141-30660-00577 on November 10, 2011.

<b>Permitted Emission Units and Pollution Control Equipment</b>
-----------------------------------------------------------------

The source consists of the following permitted emission units:

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

<b>Description of Proposed Changes</b>
----------------------------------------

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

- (a) One (1) automotive shredder residue sorting operation, identified as EU-003, permitted in 2016, with a maximum capacity of 9.0 tons per hour, and consisting of:
  - (1) One (1) metering hopper;
  - (2) One (1) cyclone and Z-box separator system;
  - (3) Three (3) induction sensor sorters; and
  - (4) Eight (8) conveyors..



### Permit Level Determination – Amendment

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the amendment. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of Proposed Amendment (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Metering Hopper	0.01	negl.	negl.	-	-	-	-	-	-
Cyclone and Z-Box Separator	0.54	0.54	0.54	-	-	-	-	-	-
Induction Sensor Sorters	0.26	0.09	0.01	-	-	-	-	-	-
Conveyor transfer points	0.04	0.01	negl.	-	-	-	-	-	-
<b>Total PTE of Proposed Amendment</b>	<b>0.85</b>	<b>0.64</b>	<b>0.55</b>	-	-	-	-	-	-
negl. = negligible									

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add emissions units, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

The proposed changes will be incorporated into MSOP Renewal No. M141-37423-00577. A separate Administrative Amendment will not be issued.

### Existing Approvals

Since the issuance of the MSOP No. M141-30660-00577 on November 10, 2011, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 141-34920-00577, issued on October 1, 2014.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

### Air Pollution Control Justification as an Integral Part of the Process

As part of MSOP No. M141-30660-00577, issued on November 10, 2011, IDEM, OAQ previously determined that the smart water injection system is an integral part of the vehicle/metal shredding process.

IDEM, OAQ is not reevaluating this integral justification at this time. Therefore, the potential PM, PM-10, and PM<sub>2.5</sub> emissions from the vehicle/metal shredding process will continue to be calculated after consideration of the smart water injection system for purposes of determining permitting level. Operating conditions in the proposed permit will specify that the smart water injection system shall operate at all times when the vehicle/metal shredding process is in operation.

### Enforcement Issue

There are no enforcement actions pending.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including St. Joseph County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour standard was revoked effective June 15, 2005.

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>  
St. Joseph County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Other Criteria Pollutants  
St. Joseph County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

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.

Since this type of operation is not one (1) 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 or National Emission Standard for Hazardous Air Pollutants 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.

### Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	23.90
PM <sub>10</sub> <sup>(1)</sup>	18.20
PM <sub>2.5</sub>	17.18
SO <sub>2</sub>	Negligible
NO <sub>x</sub>	Negligible
VOC	98.55
CO	Negligible

- (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 (PM<sub>10</sub>), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Single HAP (Toluene)	3.29
Total HAPs	12.73

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit of the entire source after issuance of this MSOP Renewal.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Vehicle/ Metal Shredder	15.89	15.89	15.89	-	-	24.90	-	3.26	0.83 (Toluene)
Shredder Conveyors	1.51	0.54	0.46	-	-	-	-	-	-
ASR Sorting Operation	0.85	0.64	0.55	-	-	-	-	-	-
Fugitive Emissions (Roadways)	7.40	1.48	0.36	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>23.90</b>	<b>18.20</b>	<b>17.18</b>	<b>-</b>	<b>-</b>	<b>24.90</b>	<b>-</b>	<b>12.73</b>	<b>3.29 (Toluene)</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	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". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

<b>Federal Rule Applicability</b>
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**Compliance Assurance Monitoring (CAM)**

- (a) 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.

**New Source Performance Standards (NSPS)**

- (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 (NESHAP) for Secondary Nonferrous Metals Processing Area Sources, 40 CFR 63, Subpart TTTTTT, are still not included in the permit, since the source does not engage in secondary nonferrous metals processing as defined in 40 CFR 63.11472.
- (d) 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.

<b>State Rule Applicability - Entire Source</b>
-------------------------------------------------

**326 IAC 1-6-3 (Preventive Maintenance Plan)**

The source is subject to 326 IAC 1-6-3.

**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, and this source is not one of the twenty-eight (28) listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**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.

**326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

**326 IAC 5-1 (Opacity Limitations)**

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.

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

The emission units at this source are subject to a more stringent PM limit under 326 IAC 6.5. Therefore, pursuant to 326 IAC 6-3-1(c), the requirements under 326 IAC 6-3-2 are not applicable.

**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.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

The requirements of 326 IAC 6-5 are not applicable to the source because it does not have the potential to emit fugitive particulate matter emissions of twenty-five (25) tons per year or more.

**326 IAC 6.8 (PM Limitations for Lake County)**

This source is not subject to 326 IAC 6.8 because this source is not located in Lake County.

**326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)**

The emission units at this source are not subject to 326 IAC 326 IAC 7-1.1 because the SO<sub>2</sub> PTE of each unit is less than 25 tons/year or 10 pounds/hour.

**326 IAC 12 (New Source Performance Standards)**

See Federal Rule Applicability Section of this TSD.

**326 IAC 20 (Hazardous Air Pollutants)**

See Federal Rule Applicability Section of this TSD.

<b>State Rule Applicability – Individual Facilities</b>
---------------------------------------------------------

**326 IAC 6.5 (PM Limitations Except Lake County)**

The source is located in St. Joseph County, the potential to emit of particulate matter (PM) emissions is greater than ten (10) tons, and is not subject to a more stringent limit under 326 IAC 12. Therefore, 326 IAC 6.5 is applicable to this source.

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the conveyors and the vehicle/metal shredder EU-001, and the Z-Box shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

The integral smart water injection system shall be in operation at all times the vehicle/metal shredder (EU-001) is in operation in order to assure compliance with this limit.

**326 IAC 8-1-6 (New facilities; General Reduction Requirements)**

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

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

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

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

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

<b>Compliance Determination and Monitoring Requirements</b>
-------------------------------------------------------------

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

The integral smart water injection system shall be in operation and control emissions from the vehicle/metal shredder (EU-001) at all times that the vehicle/metal shredder is in operation.

These monitoring conditions are necessary because the smart water injection system for the vehicle/metal shredder must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-6.1 (MSOP).

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

<b>Proposed Changes</b>
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The following changes have been made to the MSOP. Deleted language appears as ~~striketrough~~ text and new language appears as **bold** text:

- (1) The facility descriptions in Sections A.2 and D.1 have been modified to incorporate the automotive shredder residue sorting operation.
- (2) B and C Section conditions have been revised to match the most recently approved model language. Changes to these conditions have not shown in **bold** or ~~striketrough~~ text.
- (3) Condition D.1.2 - Particulate Emission Limitations has been revised to include the requirements under 326 IAC 6.5 and delete the requirements under 326 IAC 6-3-2 (previously included erroneously).
- (4) Condition D.1.3 - Particulate Control has been revised for clarification purposes.
- (5) Condition D.1.5 - Recordkeeping Requirements has been revised for clarification purposes.

<b>A.2 Emission Units and Pollution Control Equipment Summary</b>
-------------------------------------------------------------------

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

- (a) ...

- (c) **One (1) automotive shredder residue sorting operation, identified as EU-003, permitted in 2016, with a maximum capacity of 9.0 tons per hour, and consisting of:**

- (1) **One (1) metering hopper;**

- (2) One (1) cyclone and Z-box separator system;
- (3) Three (3) induction sensor sorters; and
- (4) Eight (8) conveyors.

(ed) Paved roadways and parking lots with public access.

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) ...
- (c) One (1) automotive shredder residue sorting operation, identified as EU-003, permitted in 2016, with a maximum capacity of 9.0 tons per hour, and consisting of:
  - (1) One (1) metering hopper;
  - (2) One (1) cyclone and Z-box separator system;
  - (3) Three (3) induction sensor sorters; and
  - (4) Eight (8) conveyors.

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

##### D.1.2 Particulate Emission Limitations [326 IAC 6.5-1-2-3-2]

**Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter emissions from each of the emissions units comprising EU-001, EU-002, and EU-003 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)).**

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

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

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

~~$$E = 55.0 P^{0.44} - 40$$
 where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour~~

##### D.1.4 Particulate Control

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



#### D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain records of the material throughput to the vehicle/metal shredder each month and each compliance period.
- (b) **To document the compliance status with Condition D.1.1(c) and if the Permittee did not drain and remove VOC and VHAP containing fluids on-site, the Permittee shall maintain 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,**
- (bc) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

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 July 21, 2016. Additional information was received on September 16, 2016.

#### Conclusion

The operation of this stationary vehicle and metal scrap shredding facility shall be subject to the conditions of the attached MSOP Renewal No. M141-37423-00577.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik 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) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**TSD Appendix A: Emissions Calculations  
SUMMARY OF EMISSIONS**

**Company Name:** SMS Shredding, LLC  
**Address City IN Zip:** 54450 Smilax Road, New Carlisle, IN 46552  
**Permit Number:** M141-37423-00577  
**Plt ID:** 141-00577  
**Reviewer:** Madhurima Moulik

<b>Uncontrolled Emissions (Tons/Yr)</b>					
Pollutant	Vehicle / Metal Shredder	Conveyors	ASR Sorting Operation	Roadways (Fugitive)	Total
PM	15.89	1.51	0.85	5.65	23.90
PM10	15.89	0.54	0.64	1.13	18.20
PM2.5	15.89	0.46	0.55	0.28	17.18
VOC	98.55	-	-	-	98.55
NOx	-	-	-	-	0.00
SO2	-	-	-	-	0.00
CO	-	-	-	-	0.00
Single HAP (Toluene)	3.29	-	-	-	3.29
Combined HAPs	12.73	-	-	-	12.73

**Note:**

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

<b>Controlled Emissions (Tons/Yr)</b>					
Pollutant	Vehicle / Metal Shredder	Conveyors	ASR Sorting Operation	Roadways (Fugitive)	Total
PM	15.89	1.51	0.85	5.65	23.90
PM10	15.89	0.54	0.64	1.13	18.20
PM2.5	15.89	0.46	0.55	0.28	17.18
VOC	98.55	-	-	-	98.55
NOx	-	-	-	-	0.00
SO2	-	-	-	-	0.00
CO	-	-	-	-	0.00
Single HAP (Toluene)	3.29	-	-	-	3.29
Combined HAPs	12.73	-	-	-	12.73

**Note:**

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

<b>Limited Emissions (Tons/Yr)</b>					
Pollutant	Vehicle / Metal Shredder	Conveyors	ASR Sorting Operation	Roadways (Fugitive)	Total
PM	15.89	1.51	0.85	5.65	23.90
PM10	15.89	0.54	0.64	1.13	18.20
PM2.5	15.89	0.46	0.55	0.28	17.18
VOC*	24.90	-	-	-	24.90
NOx	-	-	-	-	0.00
SO2	-	-	-	-	0.00
CO	-	-	-	-	0.00
Single HAP (Toluene)**	3.29	-	-	-	3.29
Combined HAPs**	12.73	-	-	-	12.73

**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 and VOC emissions shall not exceed 0.25 lb/ton of material throughput.

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

**Company Name:** SMS Shredding, LLC  
**Address City IN Zip:** 54450 Smilax Road, New Carlisle, IN 46552  
**Permit Number:** M141-37423-00577  
**Pit ID:** 141-00577  
**Reviewer:** Madhurima Moulik

**Particulate Emissions**

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

**Note:**

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

**Methodology:**

PTE of PM/PM10 (lb/hr) = Maximum Capacity (tons/hr) \* Emission Factor (lbs/ton)

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

**VOC Emissions**

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

**Note:**

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

**Methodology:**

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

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

HAP Emissions (Auto Shredding)		Organic HAPs												Metal HAPs			Polychlorinated Biphenyls
Process Description	Maximum Capacity (tons/hr)	Hexane (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)	Napthalene (lbs/ton)	Isocotane (lbs/ton)	Cadmium (lbs/ton)	Chromium (lbs/ton)	Lead (lbs/ton)	PCB's (lbs/ton)
	90	0.0037	0.0019	0.0002	0.0002	0.0083	0.0019	0.0068	0.0009	0.0025	0.0002	0.0001	0.00531	1.16E-06	1.28E-06	7.89E-06	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)	Napthalene (tons/yr)	Isocotane (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Lead (tons/yr)	PCB's (tons/yr)
		1.47	0.75	0.10	0.08	3.29	0.76	2.68	0.34	0.99	0.07	0.06	2.09	0.00	0.00	0.00	0.03

**Combined HAPS:** 12.73

HAP Emissions (Sheet Shredding)		Organic HAPs																
Process Description	Maximum Capacity	Chloromethane	1,3 Butadiene	Acrolein	Dichloroethene	Hexane	Benzene	Trichloroethene	Methyl Methacrylate	MIBK	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	1,4 Dichlorobenzene	Napthalene
	(tons/hr)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)
Vehicle/Metal Shredder	90	0.00002	0.00002	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	1,3 Butadiene	Acrolein	Dichloroethene	Hexane	Benzene	Trichloroethene	Methyl Methacrylate	MIBK	Toluene	Ethylbenzene	m,p-Xylenes	Styrene	o-Xylene	Cumene	1,4 Dichlorobenzene	Napthalene
		(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
		0.01	0.01	0.01	0.02	0.30	0.10	0.01	0.02	0.22	0.95	0.29	1.03	0.15	0.41	0.04	0.01	0.08

**Combined HAPS:** 3.65

**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

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

**Company Name:** SMS Shredding, LLC  
**Address City IN Zip:** 54450 Smilax Road, New Carlisle, IN 46552  
**Permit Number:** M141-37423-00577  
**Pit ID:** 141-00577  
**Reviewer:** Madhurima Moulik

**Particulate Emissions**

Process Description	Maximum Capacity (tons/yr)	Particulate Emission Factor (lbs/ton)	PTE of PM/PM10/PM2.5	
			(lb/hr)	(tons/yr)
Vehicle/Metal Shredder	788400	0.0403	3.63	<b>15.89</b>

**Note:**

Material is wetted with an integral smart water injection system to minimize explosion and fire hazards.

The emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.E for dry milling of an 80% Auto &amp; 20% Scrap throughput mixture.

Maximum capacity = 90 tons/hr.

Assumed PM = PM10 = PM2.5

**Methodology:**

PTE of PM/PM10 (lb/hr) = Maximum Capacity (tons/hr) \* Emission Factor (lbs/ton)

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

**VOC Emissions**

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

**Note:**

VOC emission factor is from the April 2010 Jackson, Michigan shredder VOC study conducted by OmniSource Corporation facility for a similar unit.

The PTE is based on the worst-case assumption that 100% auto scrap is being processed.

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

Maximum capacity = 90 tons/hr.

**Methodology:**

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

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

HAP Emissions (Auto Shredding)		Organic HAPs												Metal HAPs			Polychlorinated Biphenyls
Process Description	Maximum Capacity (tons/hr)	Hexane (lbs/ton)	Benzene (lbs/ton)	MIBK (lbs/ton)	Trichloroethylene (lbs/ton)	Toluene (lbs/ton)	Ethylbenzene (lbs/ton)	m,p-Xylenes (lbs/ton)	Styrene (lbs/ton)	o-Xylene (lbs/ton)	Cumene (lbs/ton)	Napthalene (lbs/ton)	Isocotane (lbs/ton)	Cadmium (lbs/ton)	Chromium (lbs/ton)	Lead (lbs/ton)	PCB's (lbs/ton)
Vehicle/Metal Shredder	788400	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	0.00008730
		Hexane (tons/yr)	Benzene (tons/yr)	MIBK (tons/yr)	Trichloroethylene (tons/yr)	Toluene (tons/yr)	Ethylbenzene (tons/yr)	m,p-Xylenes (tons/yr)	Styrene (tons/yr)	o-Xylene (tons/yr)	Cumene (tons/yr)	Napthalene (tons/yr)	Isocotane (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Lead (tons/yr)	PCB's (tons/yr)
		1.47	0.75	0.10	0.08	3.29	0.76	2.68	0.34	0.99	0.07	0.06	2.09	0.00	0.00	0.00	0.03

Combined HAPS: **12.73**

HAP Emissions (Sheet Shredding)		Organic HAPs																
Process Description	Maximum Capacity (tons/hr)	Chloromethane (lbs/ton)	1,3 Butadiene (lbs/ton)	Acrolein (lbs/ton)	Dichloroethene (lbs/ton)	Hexane (lbs/ton)	Benzene (lbs/ton)	Trichloroethylene (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)
Vehicle/Metal Shredder	788400	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)	Trichloroethylene (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)
		6.36E-03	7.96E-03	8.84E-03	1.86E-02	0.30	9.64E-02	1.11E-02	2.29E-02	0.22	0.95	0.29	1.03	0.15	0.41	3.97E-02	7.58E-03	7.84E-02

Combined HAPS: **3.65****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

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

**Company Name: SMS Shredding, LLC**  
**Address City IN Zip: 54450 Smilax Road, New Carlisle, IN 46552**  
**Permit Number: M141-37423-00577**  
**Plt ID: 141-00577**  
**Reviewer: Madhurima Moulik**

**Shredder Conveyor System**

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

**Note:**

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

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

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

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

**Methodology:**

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

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

**TSD Appendix A: Emissions Calculations**  
**Automotive Shredder Residue (ASR) Sorting Operation**

**Company Name: SMS Shredding, LLC**  
**Address City IN Zip: 54450 Smilax Road, New Carlisle, IN 46552**  
**Permit Number: M141-37423-00577**  
**Plt ID: 141-00577**  
**Reviewer: Madhurima Moulik**

Material is Wet Fluff

Unit	No. of Emission Points	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	PM2.5 Emission Factor (lb/ton)	Maximum Throughput (tons/hr)	PM Emissions (lb/hr)	PM PTE (tons/yr)	PM10 Emissions (lb/hr)	PM10 PTE (tons/yr)	PM2.5 Emissions (lb/hr)	PM2.5 PTE (tons/yr)
Metering Hopper	1	1.40E-04	4.60E-05	1.30E-05	9.00	1.26E-03	0.01	4.14E-04	1.81E-03	1.17E-04	5.12E-04
Cyclone and Z-Box Separator**	1	0.0137	0.0137	0.0137	9.00	0.12	0.54	0.12	0.54	0.12	0.54
Induction Sensor Sorters*	3	2.20E-03	7.40E-04	5.00E-05	9.00	0.06	0.26	0.02	0.09	1.35E-03	0.01
Conveyor Transfer Points*	8	1.40E-04	4.60E-05	1.30E-05	9.00	0.01	0.04	3.31E-03	0.01	9.36E-04	4.10E-03
							0.85			0.64	0.55

**Methodology**

\*PM, PM10 and PM2.5 emission factors based on AP-42 Chapter 11.19.2-2, Table 11.19.2-2 for Screening and Transfer Points (controlled) since the process is subsequent to the integral Smart Water Injection System.

\*\*Emission Factors from Title V Applicability Handbook - Institute of Scrap Recycling Industries - Highest tested for Z-Box Separator w/cyclone & Bleed Off

Emissions (lb/hr) = No. of Emission Points x Emission Factor (lb/ton) x Maximum Throughput (tons/hr)

Potential to Emit (tons/yr) = Emissions (lb/hr) x 8760 hr/yr x 1 ton/2000 lb

Where PM10 and PM2.5 emission factors are not available, assumed PM = PM10 = PM2.5

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

**Company Name:** SMS Shredding, LLC  
**Address City IN Zip:** 54450 Smilax Road, New Carlisle, IN 46552  
**Permit Number:** M141-37423-00577  
**Plt ID:** 141-00577  
**Reviewer:** Madhurima Moulik

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

**Vehicle Information (provided by source)**

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	50.0	1.0	50.0	20.0	1000.0	960	0.182	9.1	3318.2
Fluff Transfer to Sorting Building (one-way)	16.0	2.0	32.0	9.0	288.0	500	0.095	3.0	1106.1
Vehicle (leaving plant) (one-way trip)	50.0	1.0	50.0	20.0	1000.0	960	0.182	9.1	3318.2
<b>Total</b>			<b>132.0</b>		<b>2288.0</b>			<b>21.2</b>	<b>7742.4</b>

Average Vehicle Weight Per Trip =  $\frac{17.3}{0.16}$  tons/trip  
Average Miles Per Trip =  $\frac{17.3}{0.16}$  miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	17.3	17.3	17.3	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = mean silt loading for iron and steel production facilities (AP-42 Table 13.2.1-3)

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

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

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	1.596	0.319	0.0783	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	1.459	0.292	0.0716	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	2.65	0.53	0.13	2.42	0.48	0.12
Fluff Transfer to Sorting Building (one-way)	0.88	0.18	0.04	0.81	0.16	0.04
Vehicle (leaving plant) (one-way trip)	2.65	0.53	0.13	2.42	0.48	0.12
<b>Total</b>	<b>6.18</b>	<b>1.24</b>	<b>0.30</b>	<b>5.65</b>	<b>1.13</b>	<b>0.28</b>

**Methodology**

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

**Abbreviations**

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



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

October 6, 2016

Mr. Nick Schlipp  
SMS Shredding, LLC  
54450 Smilax Road  
New Carlisle, IN 46552

Re: Public Notice  
SMS Shredding, LLC  
Permit Level:  
Minor Source Operating Permit (MSOP) Renewal  
Permit Number: 141-37423-00577

Dear Mr. Schlipp:

Enclosed is a copy of your draft Minor Source Operating Permit (MSOP) Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the South Bend Tribune in South Bend, Indiana publish the abbreviated version of the public notice no later than October 11, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the New Carlisle Olive Township Library, 408 South Bray in New Carlisle, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Tamera Wessel, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-8530 or dial (317) 234-8530.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016





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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

October 6, 2016

South Bend Tribune  
225 West Colfax Avenue  
South Bend, IN 46626

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for SMS Shredding, LLC, St. Joseph County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than October 11, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permit Branch  
Office of Air Quality

Permit Level: Minor Source Operating Permit (MSOP) Renewal  
Permit Number: 141-37423-00577

Enclosure  
PN Newspaper.dot 8/27/2015



# Indiana Department of Environmental Management

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Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

October 6, 2016

To: New Carlisle Olive Township Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: SMS Shredding, LLC**  
**Permit Number: 141-37423-00577**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 2/16/2016



# Indiana Department of Environmental Management

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## Notice of Public Comment

**October 6, 2016**  
**SMS Shredding, LLC**  
**141-37423-00577**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.


Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV). If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	VHAUN 10/6/2016 SMS Shredding LLC 141-37423-00577 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Nick Schlipp SMS Shredding LLC 54450 Smilax Rd New Carlisle IN 46552 (Source CAATS)									
2		Kerry Davidson Exec VP SMS Shredding LLC 13830 Brainard Ave Burnham IL 60633 (RO CAATS)									
3		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)									
4		New Carlisle Town Council 113 South Arch Street, P.O. Box 6 New Carlisle IN 46552 (Local Official)									
5		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)									
6		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 (Health Department)									
7		New Carlisle Olive Township Library 408 S. Bray Street New Carlisle IN 46552 (Library)									
8		Jack Daly P.O. Box 696 New Carlisle IN 46552 (Affected Party)									
9											
10											
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Total number of pieces Listed by Sender  <b>8</b>	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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