

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION

**Indianapolis Shredding Co., L.L.C.
311 South Shelby Street
Indianapolis, Indiana 46202**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F097-5422-00111	
Issued by: Dr. Robert F. Holm, Administrator Environmental Resources Management Division	Issuance Date:

Indianapolis Shredding Co. LLC
Indianapolis, Indiana
Permit Reviewer : David Foster

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FESOP No. F097-5422-00111

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Environmental Resources Management Division (ERMD), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a metal shredding plant.

Responsible Official: Indianapolis Shredding Co., L.L.C.
Source Address: 311 South Shelby Street, Indianapolis, Indiana 46202
Mailing Address: 311 South Shelby Street, Indianapolis, Indiana 46202
SIC Code: 5093
County Location: Marion
County Status: Attainment for PM-10, Ozone, CO, SO₂, and NO₂ ;
Nonattainment for TSP
Source Status: Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

One metal shredding operation consisting of the following:

- (a) One (1) metal / fluff separation cascade installed June 1991, identified as 0001, with a maximum rated capacity of 70 tons per hour, and emissions controlled by a cyclone, and exhausting at stack #1.
- (b) One (1) hammermill operation installed June 1991, identified as 0002, with a maximum rated capacity of 70 tons per hour, and emissions controlled by cyclone and a scrubber, and exhausting at stack #2.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(1)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Paved and unpaved roads and parking lots with public access.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Indianapolis Local Agency, Environmental Resources Management Division, (ERMD), for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the conditions of all construction and operating permits issued under 326 IAC 2 prior to the effective date of this permit.

SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by ERMD .

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana 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 FESOP under 326 IAC 2-8.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, and ERMD along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM and ERMD).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and ERMD may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification which addresses the status of the Source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, and ERMD may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:

- (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;
 - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM, OAM and ERMD, upon request and shall be subject to review and approval by IDEM, OAM and ERMD.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM and ERMD, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

ERMD

Telephone No.: 317-327-2234

Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAM and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Form(s) or their substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and ERMD determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM and ERMD, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and ERMD and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) Delivered by any method and received and stamped by IDEM, OAM and ERMD, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM and ERMD upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 until IDEM, OAM and ERMD 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 in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM and ERMD, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM,

OAM and ERMD takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Environmental Resources Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM and ERMD, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) For each such change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

(c) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and ERMD, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM and ERMD, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM and ERMD or in a time period that is consistent with the payment schedule issued by IDEM, OAM and ERMD.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

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

IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM,OAM.

The test protocol shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue

Indianapolis, Indiana 46221

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.
- (b) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation.
- (c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.
- (d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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) Written notification is to be 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
 - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Asbestos
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Corrective Actions [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 40 CFR 68 is an applicable requirement, and the Permittee shall:

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM and ERMD that the Risk Management Plan is being properly implemented.

C.14 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit, exceed the level specified in any condition of this permit, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM and ERMD within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM and ERMD that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and ERMD reserves the right to utilize enforcement activities to resolve the non-compliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]

C.17 Monitoring Data Availability

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) When the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information 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 kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and ERMD representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyzes were performed;
 - (3) The company or entity performing the analyzes;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyzes; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that a source had met all the requirements stated on this permit the source shall submit a Quarterly Compliance Report. Any deviations from the requirements and dates of each deviation must be reported.
- (b) The report required in (a) of the condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (d) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

D.1

One metal shredding operation consisting of the following:

- (a) One (1) metal / fluff separation cascade, identified as 0001, with a maximum rated capacity of 70 tons per hour, and emissions controlled by a cyclone, and exhausting at stack no. 0001.
- (b) One (1) hammermill operation, identified as 0002, with a maximum rated capacity of 70 tons per hour, and emissions controlled by cyclone and a scrubber, and exhausting at stack no. 0002.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Emissions [326 IAC 6-1-2(a)] [326 IAC 2-8]

The particulate matter emissions from the metal/fluff cascade separator shall be controlled by one cyclone which vents to stack no. 0001 with a design flow rate of 50,176 scfm. The particulate emission rate from the control equipment shall not exceed 0.0263 grains per dry standard cubic of exhaust gas or 11.31 pounds per hour. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations - General Sources), and the requirements to restrict PM-10 emissions to 99 tons per 365-day period, such that the requirements of 326 IAC 2-7 (Part 70 Program) do not apply.

The particulate matter emissions from the hammermill shall be controlled by one cyclone and one scrubber which vent to stack no. 0002 with a design flow rate of 50,176 scfm. The particulate emission rate from the control equipment shall not exceed 0.0263 grains per dry standard cubic foot on exhaust gas or 11.31 pounds per hour. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations - General Sources), and the requirements to restrict PM-10 emissions to 99 tons per 365-day period, such that the requirements of 326 IAC 2-7 (Part 70 Program) do not apply.

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

A Preventive Maintenance Plan, in accordance with Section B-Preventive Maintenance Plan, of this permit, is required for these facilities and control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 12 and 18 months after issuance of this permit, the Permittee shall perform PM and testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

Compliance Monitoring Requirements

D.1.4 Operating Parameters

-
- (a) The Permittee shall monitor and record the scrubber water flow rate at least once per day when the process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the scrubber water flow rate shall be maintained at a minimum flow rate of 200 gallons per minute or a range established during a valid stack test which documents compliance with the PM limits in Condition D.1.1. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the scrubber water flow is outside the aforementioned range for any one reading.
 - (b) The Permittee shall monitor and record the fan amperage on the fan(s) controlling the air flow rate to the control devices at least once per day when the process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the fan motor amperage shall be maintained within a range 125 to 150 amps or a range established during a valid stack test which documents compliance with the PM limits in Condition D.1.1. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the amperage is outside the aforementioned range for any one reading.
 - (c) The instruments used for measuring the scrubber water flow rate and fan amperage shall be subject to approval by ERMD and/or IDEM-OAM, and shall be calibrated at least every six months.

D.1.5 Visible Emissions Notation

- (a) Daily visible emission notations of the metal / fluff separation cascade stack exhaust no. 0001 and of the hammermill stack exhaust no. 0002 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for these unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

- (a) To document compliance with condition D.1.4, the permittee shall maintain daily records of the following operational parameters during normal operation:

- (i) Induced draft fan motor(s) current consumption in amperes for stack exhaust no. 0001 and stack exhaust no. 0002,;
 - (ii) Scrubber water flow rate in gallons per minute; and
 - (iii) Documentation of corrective actions implemented, per event.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of the daily visible emissions notations of the exhaust stack nos. 0001 and 0002, and documentation of all corrective actions implemented, per event.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Send Original To:

Send Copies To:

Environmental Resources Management Division Indiana Department of Environmental Management
Air Quality Management Section Office of Air Management
Compliance Data Group Compliance Data Section
2700 South Belmont Avenue 100 North Senate Avenue
Indianapolis, Indiana 26221-2091 P.O. Box 6015
Voice: 317/327-2234 Fax: 317/327-2274 Indianapolis, Indiana 46206-6015

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Indianapolis Shredding Co., L.L.C.
Source Address: 311 South Shelby Street, Indianapolis, Indiana 46202
FESOP No.: F097-5422-00111

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Relocation Notification
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Environmental Resources Management Division Indiana Department of Environmental Management

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Indianapolis Shredding Co., L.L.C.
Source Address: 311 South Shelby Street, Indianapolis, Indiana 46202
Mailing Address: 311 South Shelby Street, Indianapolis, Indiana 46202
Part 70 Permit No.: F097-5422-00111

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the ERMD and OAM, within four (4) business hours; and
CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12
- 9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
CThe Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:
--

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

City of Indianapolis
Environmental Resources Management Division

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Background And Description

Source Name: Indianapolis Shredding Co., L.L.C.
Source Location: 311 South Shelby Street
Indianapolis, Indiana 46202
County: Marion
Operation Permit No.: F097-5422-00111
Permit Reviewer: David Foster

The Office of Air Management (OAM) and the Environmental Resources Management Division (ERMD), has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Indianapolis Shredding Co. L.L.C., relating to the operation of a metal shredding plant.

The source consists of the following approvals (permits, registrations, exemptions, etc.) with the following emission units and pollution control devices:

- (1) Certification Number 0111-0001
 - (a) Metal / fluff separation cascade, 0001, with a maximum process rate of 70 tons per hour and emissions controlled by a cyclone.
- (2) Certification Number 0111-0002
 - (a) Hammermill operations, 0002, with maximum process rate of 70 tons per hour and emissions controlled by a cyclone and a scrubber.

The source also includes the following insignificant activity:

- (1) Paved and unpaved roads and parking lots with public access.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the FESOP be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

A complete FESOP application for the purposes of this review was received on March 13, 1996.

Potential to Emit (PTE) Calculations

The source has accepted a federally enforceable limit of 99 tons per year for particulate matter less than ten microns (PM10).

Process / facility	Uncontrolled Emissions Summary (tons/year)		Controlled Emissions Summary (tons/year)	
	PM	PM-10	PM	PM-10
0001 Metal / Fluff Separator	70.1	70.1	7.01	7.01
0002 Hammermill Operation	205.42	205.42	20.54	20.54
Total Emissions	275.52	275.52	27.55	27.55

Total PTE

PTE is defined as “the maximum capacity of a stationary source to emit a pollutant under its physical and operational design.”

Pollutant	PTE (tons/year)
PM	275.52
PM-10	275.52
SO ₂	0.0
VOC	0.0
CO	0.0
NO _x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

The potential to emit (as defined in the Indiana Rule) of particulate matter less than ten microns is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.

A source with “potential to emit” high enough to make it a “major source” but whose actual emissions are below the Part 70 emission levels may elect to avoid the Part 70 Operating Permit Program by agreeing to accept a permit with federally enforceable limits that restrict its PTE to below the major source emission levels. The permit containing these restrictions is called a Federally Enforceable State Operating Permit (FESOP).

County Attainment Status

The source is located in Marion County.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	Nonattainment
PM-10	Attainment

SO ₂	Attainment
Ozone	Attainment
CO	Attainment
NO ₂	Attainment

Limited PTE

The source has accepted a federally enforceable particulate emission limit of 99 tons per 365-day period.

	Limited PTE (tons / year)
Process / facility	PM-10
Metal / fluff separator, 0001	49.5
Hammermill, 0002	49.5
Insignificant Activities	0
Total	99.0

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) applicable to this facility.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability

326 IAC 2-3 Emission Offset

The Emissions Offsets rule applies since these facilities were installed in 1991 and have PM emissions greater than 100 tons per year. However, Indianapolis Shredding Co., L.L.C., has limited their potential to emit PM to 99 tons per 365-day period by accepting the FESOP limits.

326 IAC 2-8-4 FESOP

Pursuant to this rule, the amount of PM-10 emitted is limited to 99 tons per 365-day period rolled. Indianapolis Shredding Co., L.L.C., has accepted conditions that require the use of control equipment when particulate matter emitting facilities are in operation, in order to comply with this limit.

326 IAC 5-1: Opacity

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following:

- (a) Visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings,
- (b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15

minutes (60 readings) in a 6-hour period.

326 IAC 6-1-2: Nonattainment Area Particulate Limitations: Specified

The source is located in a nonattainment area for PM. The limitations for this source are not specified elsewhere in Section 1-2. The rule limits particulate limitations for 0001 and 0002 at 0.03 gr/dscf. This permit will limit emissions to 0.0263 gr/dscf which will satisfy this rule. These emission limits coincide with an source-wide limit of 99 tons per 365-day rolled period. Based on stack tests performed in 1991, the actual emission rates, after controls, were 0.0105 gr/dscf for 0001 and 0.0197 gr/dscf for 0002. Therefore, the source appears to be able to satisfy the limits of this rule.

326 IAC 6-4: Fugitive Dust Emissions

This rule requires the source not to generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 6-5: Fugitive Particulate Emissions Limitations

The fugitive dust emissions are 15.29 tons per year and, therefore, no fugitive dust control plan is required. However, a plan was submitted, reviewed, and approved. The source states it shall comply with all dust abatement measures contained therein.

Compliance Monitoring

The source has uncontrolled potential emissions above the 99 ton per 365-day period rolled limit for particulate matter less than ten microns and has applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall measure scrubbant flow at least once per day when the metal / fluff separator is in operation. The scrubbant flow rate shall be maintained as follows:
 - (i) A minimum of 200 gallons per minute, or
 - (ii) As per under conditions of the Preventive Maintenance Plan which shall specify corrective action, or
 - (iii) A range established during the latest stack tests which is approved by ERMD and IDEM, OAM.

- (b) The Permittee shall measure the induced draft fan motor power consumption of the control equipment when the respective system is in operation. The amperage draw shall be as follows:
 - (i) Within a range of 125 and 150 amperes per hour, or
 - (ii) As per under conditions of the Preventive Maintenance Plan which shall specify corrective action, or
 - (iii) A range established during the latest stack tests which is approved by ERMD and IDEM, OAM.

The instruments used for measuring the flow rate and power consumption shall be subject to approval by ERMD and/or IDEM-OAM, and the frequency of calibration shall be listed and performed

according to the vendor specifications.

The Preventive Maintenance Plan for these emitting units shall contain troubleshooting contingencies and corrective actions for when scrubber water flow rate or induced draft fan amperage are out of ranges specified above for any one measurement.

- (c) Daily visible emission notations of the metal / fluff separation cascade stack exhaust no. 0001 and of the hammermill stack exhaust no. 0002 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
 - (i) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (ii) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (iii) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (iv) The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the control equipment for the metal / fluff separator and for the hammermill must operate properly to ensure compliance with 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application GSD-08.

None of these listed air toxics will be emitted from this source.

Conclusion

The operation of this metal shredding plant will be subject to the conditions of the attached proposed **FESOP No. F097-5422-00111**.

Description of facility: Metal Shredding Line
Max Rating: 60,000 cubic feet per minute
Construction Date: 1991
Control Device (if any): Cyclone and Scrubber
Stack/Vent ID: 1, and 2

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM: 99 ton per 365-day period rolled for the metal / fluff separator, 0001 and hammermill (metal shredder), 0002	
Regulation/Citation:	326 IAC 2-8-4(1)	
Compliance Demonstration:	Initial stack test to determine operating parameters for and to determine accuracy of emission info for 0001 and 0002	
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	PM	
Testing Method/Analysis:	Method 5	
Testing Frequency/Schedule:	Once every permit cycle	
Submittal of Test Results:	45 days after completion of test	
COMPLIANCE MONITORING		
Monitoring Description:	Flow rate of scrubbant, and scrubber fan motor current draw	
Monitoring Method:	Flow meter; amp meter	
Monitoring Regulation/Citation:	326 IAC 2-8-5(a)(1)	
Monitoring Frequency:	Once /daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Flow rate of scrubbant, and induced draft fan motor current draw	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information to be Maintained in Report:	Flow rate of scrubbant, and induced draft fan motor current draw	

Calculations for Indianapolis Shredding Co., L.L.C., F097-5422-00111

- A. Determine Potential Emissions. Emissions are based upon stack tests performed 1991.

Estimated control efficiency of Collection Systems for both 0001 and 0002 is 90%.
Actual emissions were 1.6 lb per hour for 0001 and 4.69 lb per hour for 0002

Calculation 1.0-

$$\frac{1.6 \text{ lb}}{\text{hr}} \times \frac{1}{(1.0 - 0.9)} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2,000 \text{ lb}} = 70.1 \text{ tons per yr}$$

Calculation 1.1-

$$\frac{4.69 \text{ lb}}{\text{hr}} \times \frac{1}{(1.0 - 0.9)} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2,000 \text{ lb}} = 205.42 \text{ tons per yr}$$

- B. Determine allowable limits to keep source-wide emissions below 100 tons PM per year for 0001:

Calculation 2.0-

$$60,000 \text{ acfm} \times \frac{459.67}{90 + 459.67} = 50,175.9 \text{ scfm}$$

Calculation 2.1-

$$\frac{50,176 \text{ scf}}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{0.0263 \text{ gr}}{\text{scf}} \times \frac{\text{lb}}{7,000 \text{ gr}} = 11.31 \text{ lbs PM/hr}$$

Calculation 2.2-

$$\frac{11.31 \text{ lb PM}}{\text{hr}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{\text{ton PM}}{2,000 \text{ lb PM}} = 49.5 \text{ ton PM/yr}$$

Determine allowable limits for 0002:

Calculation 3.0-

$$60,000 \text{ acfm} \times \frac{459.67}{90 + 459.67} = 50,175.9 \text{ scfm}$$

Calculation 3.1-

$$\frac{50,176 \text{ scf}}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{0.0263 \text{ gr}}{\text{scf}} \times \frac{\text{lb}}{7,000 \text{ gr}} = 11.31 \text{ lbs PM/hr}$$

Calculation 3.2-

$$\frac{11.31 \text{ lb PM}}{\text{hr}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{\text{ton PM}}{2,000 \text{ lb PM}} = 49.5 \text{ ton PM/yr}$$

Determine allowable limits for both 0001 and 0002:

Calculation 4.0-

$$\frac{49.5 \text{ ton}}{\text{yr}} + \frac{49.5 \text{ ton}}{\text{yr}} = 99.0 \text{ tons / yr}$$

- C. Determine Limited Potential to Emit Emissions

For 0001 controlled emissions based on testing are:

Calculation 5.0-

$$\frac{1.6 \text{ lb}}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 7.01 \text{ tons / yr}$$

For 0002 controlled emissions based on testing are:

Calculation 5.1-

$$\frac{4.69 \text{ lb}}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 20.54 \text{ tons / yr}$$

The total controlled emissions from these facilities is :

Calculation 6.0-

$$\frac{7.01 \text{ tons}}{\text{yr}} + \frac{20.54 \text{ tons}}{\text{yr}} = 27.55 \text{ tons / yr}$$

27.55 tpy is less than 99 tons, therefore, this source can show compliance.

ENVIRONMENTAL RESOURCE MANAGEMENT DIVISION

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP) for

Indianapolis Shredding Co. LLC
311 South Shelby Street
Indianapolis, Indiana 46202

F-097-5422-00111

On October 1, 1996, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Indianapolis Shredding Co. LLC had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an automobile and light appliance shredding operation. The notice also stated that ERMD proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the ERMD has decided to make the following changes to the FESOP:

(Changes to Section A)

The following items were modified or added in Section A of the FESOP:

1. A.1 General Information [326 IAC 2-8-3(b)] The rule citation was changed.
2. A.2 Emission Units and Pollution Control Devices [326 IAC 2-8-3(c)(3)] The equipment description was changed.
3. A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(1)] A rule citation was added.
4. A.4 FESOP Applicability [326 IAC 2-8-2] The following was added: "and the Environmental Resource Management Division (ERMD)".
5. A.5 Prior Permit Conditions Superseded [326 IAC 2] The condition was added.

(Changes to Section B)

The following conditions were modified or added in Section B of the FESOP:

1. B.1 General Requirements [IC 13-15] [IC 13-17] Rule citation was modified.
2. B.2 Definitions [326 IAC 2-8-1] Language was modified.
3. B.3 Permit Term [326 IAC 2-8-4(2)] Language and rule citation were modified.
4. B.4 Enforceability [326 IAC 2-8-6] Section (c) was added.
5. B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)] Language and rule citation were modified.
6. B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)] Language and rule citation were

modified.

7. B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] - Former subsection (b) was deleted.
8. B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] Subsection (b) was added.
9. B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)] Subsections (a) and (b) were modified. Subsection (d) was added.
10. B.13 Preventive Maintenance Plans [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)] Language and rule citation were modified.
11. B.14 Emergency Provision [326 IAC 2-8-12] Subsections were added. Language and rule citation were modified.
12. B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)] Format was modified.
- 13.. B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8] Rule citation was modified.
14. B.17 Permit Renewal [326 IAC 2-8-3(h)] Subsection (B) was added.
15. B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-8] Entire section was added.
16. B.23 Operational Flexibility [326 IAC 2-8-15] Language was modified. USEPA address was changed.
17. B.24 Construction Permit Requirement [326 IAC 2] Language was modified.
18. B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10] Entire condition was added.

(Changes to Section C)

The following conditions were modified or added in Section C of the FESOP:

1. C.1 Overall Source Limit [326 IAC 2-8] Condition was added. (This condition replaced the former C.1 Particulate Matter.)
2. C.3 Open Burning [326 IAC 2-1-6] Language was modified.
3. C.4 Incineration [326 IAC 2-1-6] [326 IAC 2-1-6] Condition was added.
4. C.5 Fugitive Dust Emissions Language was modified. (Formerly C.4)
5. C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)] Language was modified.
6. C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61, Subpart M] Condition was added.

7. C.8 Performance Testing [326 IAC 3-2.1] Language was modified. (Formerly C.7)
8. C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)] Language was modified. (Formerly C.8)
9. C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)] Language was modified. (Formerly C.9)
10. C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140] Entire condition was added.
11. C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215] Condition was added.
12. C.14 Compliance Monitoring plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)] Condition was added.
13. C.15 Actions Related to Noncompliance Demonstrated by a Stack Test; Language was modified.
14. C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)] Condition was added.
15. C.17 Monitoring Data Availability; Condition was added.
16. C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)] Language was modified. (Formerly C.17)
17. C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] Language was modified. (Formerly C.18)
18. C.20 Compliance with 40 CFR 82 and 326 IAC 22-1; Condition was added.

(Changes to Section D)

1. D.1.1 Particulate Emissions [326 IAC 6-1-2(a)] [326 IAC 2-8] Replaced Particulate Matter less than 10 Microns (PM-10).
2. D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3] Condition was added.
3. D.1.3 Testing Requirements [326 IAC 2-8-5(1)] Replaced D.1.4 Stack Testing.
4. D.1.4 Operating Parameters; Language was modified. (Formerly D.1.3)
5. D.1.5 Visible Emissions Notation; Replaced Daily Visible Emissions.
6. D.1.6 Record Keeping Requirements; Condition was added.
7. D.1.6 Preventive Maintenance [326 IAC 2-8-4(9)] Condition was added.
8. Certification Form - Form was modified.
9. Deviation Occurance Form (for Control Equipment Monitoring Only) - IDEM, OAM was placed on the

top of the forms.

10. Deviation Occurrence Form - IDEM, OAM was placed on the top of the forms.
11. Relocation Form - Form has been deleted from the permit.
12. Reporting Form - Form has been deleted from the permit.

(Changes to Technical Support Document)

1. **County Attainment Status** The status for SO₂ was changed to "Attainment". The row titled VOC was changed to "Ozone". The changes are reflected in the table, below.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	Nonattainment
PM-10	Attainment
SO ₂	Attainment
Ozone	Attainment
CO	Attainment
NO ₂	Attainment

2. **Limited PTE** - The Limited PTE (tons/yr) allocation was modified, reflecting the use of more appropriate calculations. The new limits are reflected in the table, below.

	Limited PTE (tons / year)
Process / facility	PM-10
Metal / fluff separator	49.5
Hammermill	49.5
Insignificant Activities	0
Total	99.0

3. **Federal Rule Applicability**

A statement regarding NESHAP applicability was added to this section.

State Rule Applicability

4. 326 IAC 2-3: Emission Offset; This statement was modified.
5. 326 IAC 2-8-4: FESOP; This statement was modified.
6. 326 IAC 6-1-2: Nonattainment Area Particulate Limitations: Specified; This statement replaced 326 IAC 6-3-2 Process Operations.

7. 326 IAC 6-5: Fugitive Particulate Emissions Limitations; This statement was modified.
8. **Compliance Monitoring** This section was modified.
9. Table for summarizing emission limitations, performance testing, compliance monitoring, and record keeping was added. The table has been reproduced on the next page.

Indianapolis Shredding Co. LLC.
 Indianapolis, Indiana
 Permit Reviewer: David Foster

Page 6 of 6
 FESOP No. F097-5422-00111
 TSD Addendum

Description of facility: Metal Shredding Line
Max Rating: 60,000 cubic feet per minute
Construction Date: 1991
Control Device (if any): Cyclone and Scrubber
Stack/Vent ID: 0001 and 0002

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM: 99 ton per 365-day period rolled for the metal / fluff separator, 0001 and hammermill (metal shredder), 0002	
Regulation/Citation:	326 IAC 2-8-4(1)	
Compliance Demonstration:	Initial stack test to determine operating parameters for and to determine accuracy of emission info for 0001 and 0002	
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	PM	
Testing Method/Analysis:	Method 5	
Testing Frequency/Schedule:	Once every permit cycle	
Submittal of Test Results:	45 days after completion of test	
COMPLIANCE MONITORING		
Monitoring Description:	Flow rate of scrubbant, and scrubber fan motor current draw	
Monitoring Method:	Flow meter; amp meter	
Monitoring Regulation/Citation:	326 IAC 2-8-5(a)(1)	
Monitoring Frequency:	Once /daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Flow rate of scrubbant, and induced draft fan motor current draw	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information to be Maintained in Report:	Flow rate of scrubbant, and induced draft fan motor current draw	