

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW (ENSR)
OFFICE OF AIR MANAGEMENT**

**OmniSource Corporation
2511 Taylor Street,
Fort Wayne, Indiana 46802**

(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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F003-8920-00283	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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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 presented in the permit application.

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

The Permittee owns and operates a stationary aluminum, copper and other metal alloys recycling operation.

Responsible Official: OmniSource Corporation
Source Address: 2511 Taylor Street, Fort Wayne, Indiana 46802
Mailing Address: 1610 North Calhoun Street, Fort Wayne, Indiana 46808
SIC Code: 5093
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD or Emission Offset Rules;

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

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

- (a) One (1) wire reclamation system, with a maximum capacity of 18,000 pounds of aluminum and copper per hour, consisting of the following equipment:
 - (1) Two (2) primary grinder identified as PG-1 & 2, three (3) secondary grinders identified as SG-1 to SG-3, with a baghouse for particulate control, identified as C-1, exhausting at one (1) stack B-2.
 - (2) Four (4) air tables identified as T-1 to T-4, particulate matter controlled by a twin cyclone identified as CY-1 and a baghouse identified as M-1, exhausting at one (1) stack, identified as B-1.
- (b) One (1) metal alloys chip recycling operation consisting of the following:
 - (1) One (1) metal alloy crusher, maximum capacity of recycling 6,000 pounds of various metal alloys per hour;
 - (2) One (1) natural gas fired rotary dryer rated at 2.70 million British thermal units (MMBTU/hr) identified as D-2, maximum capacity of 2,000 pounds of various metal alloys per hour, particulate matter controlled by a cyclone identified as CY-2 and volatile organic compounds controlled by a natural gas fired afterburner rated at 3.0 million British thermal units (MMBtu/hr) identified as AB-1, exhausting at one (1) stack, identified as D-1;
 - (3) One (1) Screener, maximum capacity of 2000 pounds of metal alloys per hour, particulate matter controlled by a baghouse identified as C-2, exhausting at one (1) stack, identified as BH-1;
 - (4) One (1) metal alloys storage bin, capacity of storing total of 20 tons metal alloys turnings;
 - (5) One (1) metal alloys storage bin, capacity of storing total of 40 tons finished metal alloys.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 FESOP Permit 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 the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

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

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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 FESOP under 326 IAC 2-8.

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.
- (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.

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)]

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.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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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, copies of records required to

be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

IDEM, OAM 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)] [326 IAC 2-8-5(1)]

(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) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

(a) The Permittee shall annually submit a compliance certification report 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 cover the time period from January 1 to December 31 of the previous year, and 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

(b) The annual compliance certification report 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, OAM, on or before

the date it is due.

- (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, may require to determine the compliance status of the source.

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(34).

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, .

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 , within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Failure to notify IDEM, OAM , 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

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(34).

- (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 , 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 , 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 response steps 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

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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 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, 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, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, 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 shall include 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(21).

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) 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) 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, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM 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 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, 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, 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), except as provided by 326 IAC 2-8-11(c).
- (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 provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, 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, review by affected states 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 (this term is defined at 326 IAC 2-7-1(36)) 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

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, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such Section 502(b)(10) of the Clean Air Act 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(34).

- (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]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved 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, 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 , 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 by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM 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, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [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.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does 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 forty percent (40%) 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)]

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, as described in Section D of this permit.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18][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 be accredited is federally enforceable.

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in 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

no later than thirty-five (35) days before the intended test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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 as required by this permit. 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

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(34).

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

(a) 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. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. 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 according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across the baghouse and cyclone, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

C.13 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) The Permittee shall insure 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
 - (3) 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

Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (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. The requirement that the inspector be accredited is federally enforceable.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 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 a part of the compliance certification submitted under 326 IAC 2-7-6(5), 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, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

C.15 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) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps 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 response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring 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 process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.16 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement

activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. 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.17 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing 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) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, 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 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 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 analyses were performed;
 - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
 - (5) The results of such analyses; 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 preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (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 the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this 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
- (c) 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, OAM, on or before the date it is due.
- (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 or response steps taken as a result of each deviation 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

- (a) One (1) wire reclamation system, with a maximum capacity of 18, 000 pounds of aluminum and copper per hour, consisting of the following equipment:
- (1) Two (2) primary grinder identified as PG-1 & 2, three (3) secondary grinders identified as SG-1 to SG-3, with a baghouse for particulate control, identified as C-1, exhausting at one (1) stack B-2.
 - (1) Four (4) air tables identified as T-1 to T-4, particulate matter controlled by a twin cyclone identified as CY-1 and a baghouse identified as M-1, exhausting at one (1) stack, identified as B-1.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the wire reclamation operations shall not exceed 17.85 pounds per hour when operating at a process weight rate of 18,000 pounds per hour.

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Wire Reclamation System:(P =6 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (9)^{0.67} \\ &= 17.85 \text{ lb/hr} \end{aligned}$$

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) wire reclamation facility and the baghouses identified as C-1 and M-1, cyclone identified as CY-1.

Compliance Determination Requirements

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

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM-10 testing at the baghouses identified as C-1 and M-1 utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, 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. The tests shall be performed according to 326 IAC 3-2.1 (Source sampling

Procedures). PM-10 includes filterable and condensable PM-10. PM₁₀ limit shall be as follows:

Process: Wire Reclamation System	PM ₁₀ Limit
Baghouse (C-1)	17.85 pound per hour
Baghouse (M-1)	

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

D.1.4 Particulate Matter (PM-10)

The cyclone identified as CY-1 and the bag houses identified as C-1 & M-1 for PM -10 control shall be in operation at all times when the two (2) primary grinder identified as PG-1& 2, three (3) secondary grinders identified as SG-1 to SG-3, four air tables identified as T-1 to T-4 are in operation.

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the bag house stack exhaust identified as B-1 and B-2 shall be performed once per working shift 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 Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drops across the baghouses identified as C-1 and M-1 used in conjunction with the wire reclamation process operation, at least once per shift when the wire reclamation is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses identified as C-1 and M-1 shall be maintained within the range of 0.5 and 5.0 inches of water. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been

repaired or replaced.

- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the wire reclamation stack exhausts identified as B-1 and B-2.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure for the baghouses identified as C-1 and M-1.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY CONDITIONS

- (b) One (1) metal alloys chip recycling operation consisting of the following:
- (1) One (1) metal alloy crusher, maximum capacity of recycling 6,000 pounds of various metal alloys per hour;
 - (2) One (1) natural gas fired rotary dryer rated at 2.70 million British thermal units (MMBTU/hr) identified as D-2, maximum capacity of 2,000 pounds of various metal alloys per hour, particulate matter controlled by a cyclone identified as CY-2 and volatile organic compounds controlled by a natural gas fired afterburner rated at 3.0 million British thermal units (MMBTU/hr) identified as AB-1, exhausting at one (1) stack, identified as D-1;
 - (3) One (1) Screener, maximum capacity of 2000 pounds of metal alloys per hour, particulate matter controlled by a baghouse identified as C-2, exhausting at one (1) stack, identified as BH-1;
 - (4) One (1) metal alloys storage bin, capacity of storing total of 20 tons metal alloys turnings;
 - (5) One (1) metal alloys storage bin, capacity of storing total of 40 tons finished metal alloys.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

- D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.
- D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

- D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM .

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

Operation Conditions

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

D.2.6 Particulate Matter (PM) [326 IAC 6-3-2 (c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the rotary dryer and screener shall not exceed 4.10 pounds per hour when operating at a process weight rate of 2000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Rotary Dryer: (P =1 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (1)^{0.67} \\ &= 4.10 \text{ lb/hr} \end{aligned}$$

D.2.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for one (1) rotary dryer identified as D-2 and the cyclone identified as CY-2 and an after burner identified as AB-1, one (1) screener and the baghouse identified as C-2.

D.2.8 General Reduction Requirement [326 IAC 8-1-6]

Pursuant (326 IAC 8-1-6) General Reduction Requirement,

The afterburner identified as AB-1 shall be used at all times the rotary dryer is in operation. When operating, the afterburner shall maintain at a minimum burner operating temperature and fan amperages as determined from the compliance test described in D.2.10 to achieve

- (a) capture efficiency of 95%

- (b) destruction efficiency of 90%

D.2.9 Particulate Matter [326 IAC 2-1-3(i)(8)]

The cyclone identified as CY-2, and baghouse identified as C-2 for PM -10 shall be in operation at all times when the rotary dryer and screener are in operation respectively.

Compliance Determination Requirements

D.2.10 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 60 to 180 days after the issuance of this permit, the Permittee shall perform compliance test for volatile organic compounds (VOC) from afterburner. The tests shall be performed according to 326 IAC 3-2.1 (Source sampling Procedures). The test shall include,

- (a) capture efficiency
- (b) destruction efficiency
- (c) burner temperature
- (d) fan amperages

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

D.2.11 Parametric Monitoring for Particulate Matter (PM-10)

- (a) The Permittee shall record the total static pressure drops for the baghouse identified as C-2 at least once per working shift when the rotary dryer is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse identified as C-2 shall be maintained within the range of 0.5 to 5.0 inches of water. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.12 Parametric Monitoring for Volatile Organic Compound (VOC)

The Permittee shall record the burner temperature and fan amperages at afterburner identified as AB-1 at least once per working shift when the rotary dryer is in operation.

D.2.13 Visible Emissions Notations

- (a) Daily visible emission notations of the after burner stack exhaust identified as D-1 and baghouse stack identified as BH-1 shall be performed once per working shift 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 Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.14 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.2.15 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.12, D.2.13, the Permittee shall maintain records at least the 36 month period and made available upon request to the Office of Air Management.
- (b) To document compliance with Condition D.2.11, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure for the baghouses identified as C-2.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: OmniSource Corporation
Source Address: 2511 Taylor Street, Fort Wayne, Indiana 46802
Mailing Address: 1610 North Calhoun Street, Fort Wayne, Indiana 46808
FESOP No.: F003-8920-00283

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 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**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**

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

Source Name: OmniSource Corporation
Source Address: 2511 Taylor Street, Fort Wayne, Indiana 46802
Mailing Address: 1610 North Calhoun Street, Fort Wayne, Indiana 46808
FESOP Permit No.: F003-8920-00283

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 Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(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: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background And Description

Source Name:	OmniSource Corporation
Source Location:	2511 Taylor Street, Fort Wayne, Indiana 46802
County:	Allen
SIC Code:	5093
Operation Permit No.:	F003-8920-00283
Permit Reviewer:	Manoj P. Patel

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from OmniSource Corporation relating to the operation of aluminum, copper and other metal alloys recycling.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) wire reclamation system, with a maximum capacity of 12,000 pounds of aluminum and copper per hour, consisting of the following equipment:
 - (1) One (1) primary grinder identified as PG-1, three (3) secondary grinders identified as SG-1 to SG-3, with a baghouse for particulate control, identified as C-1, exhausting at one (1) stack B-2.
 - (2) Four (4) air tables identified as T-1 to T-4, particulate matter controlled by a twin cyclone identified as CY-1 and a baghouse identified as M-1, exhausting at one (1) stack, identified as B-1.

Unpermitted Emission Units and Pollution Control Equipment

There are no Unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

- (b) The application includes information relating to the construction and operation of a metal alloy chip recycling, consisting of the following equipment:
 - (1) One (1) metal alloy crusher, maximum capacity of recycling 6,000 pounds of various metal alloys per hour;
 - (2) One (1) natural gas fired rotary dryer rated at 2.70 million British thermal units (MMBTU/hr) identified as D-2, maximum capacity of 2,000 pounds of various metal alloys per hour, particulate matter controlled by a cyclone identified as CY-2 and volatile organic compounds

controlled by a natural gas fired afterburner rated at 3.0 million British thermal units (MMBtu/hr) identified as AB-1, exhausting at one (1) stack, identified as D-1;

- (3) One (1) Screener, maximum capacity of 2000 pounds of metal alloys per hour, particulate matter controlled by a baghouse identified as C-2, exhausting at one (1) stack, identified as BH-1;
- (4) One (1) metal alloys storage bin, capacity of storing total of 20 tons metal alloys turnings;
- (5) One (1) metal alloys storage bin, capacity of storing total of 40 tons finished metal alloys.

The rotary dryer (ID #D-2), cyclone (Cy-2), afterburner (AB-1), and the baghouse (C-2) will be replaced from the Omni Source Corporation 1610 North Calhoun Street, Fort Wayne, Indiana 46808.

Insignificant Activities

This source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

Existing Approvals

This source has been operating under the following approvals:

- (1) R003-2161-000283, issued on October 4, 1991.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 administratively complete Construction Permit application for the purposes of this review was received on August 29, 1997. Additional information was received on November 20, 1997.

Emissions Calculations

The source wide emissions calculation is as follows:

- (A) Mechanical wire reclamation system:

Particulate matter emissions are based on the application submitted on August 6, 1991 and registration issued on October 4, 1991.

Grinding System:

$$\begin{aligned}
 \text{Controlled PM / PM-10 emissions/hr} &= (0.0021 \text{ gr./acf}) \times (28,500 \text{ acf/min}) \times (60 \text{ min/hr}) \times (1 \text{ lb./7000 gr.}) \\
 &= 0.51 \text{ lb./hr} \\
 \text{Uncontrolled PM /PM10 emissions / hr.} &= \text{controlled emissions} / (1 - \text{control eff.}) \\
 &= (0.51 / 1 - 0.99) \text{ lb./hr} \\
 &= 51.0 \text{ lb./hr} \\
 \\
 \text{Potential PM / PM-10 Emissions} &= (\text{uncontrolled PM emission/hr}) \times (8670 \text{ hr/year}) \times (1 \text{ ton} / 2000 \text{ lbs.}) \\
 &= (51 \text{ lb./hr}) \times (8760 \text{ hrs./year}) \times (\text{ton} / 2000 \text{ lbs.}) \\
 &= 223.40 \text{ tons/year}
 \end{aligned}$$

Air Tables / Gravity Separation Operation

$$\begin{aligned}
 \text{Controlled PM / PM-10 emissions / hr.} &= (0.0021 \text{ gr./acf}) \times (60 \text{ min/hr}) \times (37247 \text{ acf /min}) \times (1 \text{ lb./} 7000 \text{ gr.}) \\
 &= 0.67 \text{ lb./hr} \\
 \\
 \text{Uncontrolled PM / PM-10 emissions/ hr.} &= \text{controlled emissions} / (1 - \text{control eff.}) \\
 &= (0.67 / 1 - 0.99) \text{ lb./hr} \\
 &= 67 \text{ lb./hr} \\
 \\
 \text{Potential PM / PM-10 Emissions} &= (\text{uncontrolled PM emission/hr}) \times (8670 \text{ hr/year}) \times (1 \text{ ton} / 2000 \text{ lbs.}) \\
 &= (67 \text{ lb./hr}) \times (8760 \text{ hrs./year}) \times (\text{ton}/2000 \text{ lbs.}) \\
 &= 293.40 \text{ ton/year}
 \end{aligned}$$

(B) Metal Alloys Crushing Operation:

There are negligible particulate emissions from this operation.

(C) Rotary Dryer Operation:

This process involves heating metal scraps that contain organic contaminants in rotary dryers to temperatures high enough to vaporize, but not high enough to melt metals. The company estimated that there is a 2% oil content in the metal alloys scraps. A lab analysis report has been submitted to support oil content in the metal scraps by the company. The particulate emission factor from the rotary dryer is chosen from the secondary copper metal operation in AP-42. The rotary dryer handles various types of metal alloys including aluminum, copper, tin and zinc.

$$\begin{aligned}
 \text{Uncontrolled VOC emissions} &= (2 \text{ lb. VOC} / 100 \text{ lb. Metal Scraps}) \times (2000 \text{ lb. Metal scrap} / \text{hr}) \times (8760 \text{ hrs./year}) \times (1 \text{ ton} / 2000 \text{ lb.}) \\
 &= 175.20 \text{ tons per year} \\
 \\
 \text{Uncontrolled PM emissions} &= (2.60 \text{ lb. PM} / \text{tons of charge}) \times (2000 \text{ lb.})
 \end{aligned}$$

$$\begin{aligned} & \text{Metal charge/hr) x (8760 hrs/year) x (1} \\ & \text{ton / 2000 lb.)} \\ = & \quad 11.40 \text{ tons/year} \end{aligned}$$

(D) Natural Gas-Fired Combustion: Rotary Dryer & After Burner

See Appendix A of TSD for detailed calculation for a Rotary Dryer.

See Appendix B of TSD for detailed calculation for an Afterburner.

(E) Screening Operation:

$$\begin{aligned} \text{Controlled PM /PM-10 emissions} & = (0.013 \text{ grains/acf}) \times (3600 \text{ acf/min}) \times (60 \\ & \text{min/hr}) \times (\text{lb}/7000 \text{ grains}) \\ & = 0.40 \text{ lb./hr} \\ & = 1.75 \text{ tons/yr} \end{aligned}$$

The potential emissions are estimated as follows:

$$\begin{aligned} \text{Uncontrolled PM / PM-10 emissions} & = (\text{Controlled PM emissions}/(1- \text{control} \\ & \text{eff.})) \\ & = (0.40 \text{ lb/hr})/ (1-0.97) \\ & = (0.40/ 0.03) \text{ lb./hr} \\ & = (13.37 \text{ lb./hr}) \times (8760 \text{ hrs/year}) \times (1\text{ton}/ \\ & \text{2000 lb}) \\ & = 58.60 \text{ tons/year} \end{aligned}$$

(F) Storage Bin Process:

There are negligible emissions from this process.

Summary of Emissions

			PM / PM ₁₀	VOC	NO _x	SO ₂	CO
Permitted Equipment (FESOP)	Wire Reclamation Process	Grinders	223.4	0.0	0.0	0.0	0.0
		Air Tables	293.4	0.0	0.0	0.0	0.0
Equipment under ENSR	Metal Alloy Crusher		0.0	0.0	0.0	0.0	0.0
	Rotary Dryer		11.60	175	2.50	0.02	0.50
	Screener		58.60	0.0	0.0	0.0	0.0
	Storage Bins		0.0	0.0	0.0	0.0	0.0
Total Uncontrolled Emissions (tons/year)			587	175	2.50	0.02	0.50
Total Controlled Emissions (tons/year)			6.0	5.30	2.50	0.02	0.50

Total Potential and Allowable Emissions (for the ENSR)

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	35.9	70.3
Particulate Matter (PM10)	35.9	70.3
Sulfur Dioxide (SO ₂)	0.02	0.02
Volatile Organic Compounds (VOC)	175	175
Carbon Monoxide (CO)	0.50	0.50
Nitrogen Oxides (NO _x)	2.50	2.50
Single Hazardous Air Pollutant (HAP)	0.0	0.0
Combination of HAPs	0.0	0.0

(a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3.

(1) Rotary Dryer: (P = 1 ton/hr)
 $E = 4.10 P^{0.67}$
 $= 4.10 (1)^{0.67}$
 $= 4.10 \text{ lb/hr}$
 $= 17.95 \text{ tons/hr}$

(2) Screening Process: (P = 1 ton/hr)
 $E = 4.10 P^{0.67}$
 $= 4.10 (1)^{0.67}$
 $= 4.10 \text{ lb/hr}$
 $= 17.95 \text{ tons/hr}$

(b) The allowable particulate matter (PM) emissions based on the rules cited are less than the potential emissions, therefore, the allowable emissions are used for the permitting determination.

Potential Emissions (for FESOP)

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	587
PM-10	587
SO ₂	0.02
VOC	175
CO	0.50
NO _x	2.50

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

HAP	Potential Emissions (tons/year)
NONE	0.0
TOTAL	0.0

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compound (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Limited Potential To Emit

Source's potential-to-emit (PTE) volatile organic compounds (VOC) and PM-10 of less than 100 tons per year, will be accomplished by the enforceable controls.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
TSP	attainment or unclassifiable
PM-10	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	1.70	1.70	0.02	5.30	0.50	2.50
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increases

are less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS):

There are no New Source Performance Standards 40 CFR 60 (326 IAC 12) applicable to this source.

(b) National Standards for Hazardous Air Pollutants (NESHAPs):

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

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not located in area of the listed counties and does not have potential to emit equal to or more than one hundred (100) tons per year of any pollutants. PM_{10} is limited at 99 tons per year.

326 IAC 5-1 (Visible Emissions Limitations)

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 forty percent (40%) 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.

326 IAC 6-3-2 (Process Operations)

This rule mandates an allowable PM emissions on the wire reclamation system, rotary dryer and screening operation using the following equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Wire Reclamation System: (P =6 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (6)^{0.67} \\ &= 13.60 \text{ lb/hr} \\ &= 59.7 \text{ tons/hr} \end{aligned}$$

Based on this calculation, the potential emissions after the control are less than the allowable emissions, therefore, this rotary dryer complies with the rule.

Rotary Dryer: (P = 1 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (1)^{0.67} \\ &= 4.10 \text{ lb/hr} \\ &= 17.95 \text{ tons/hr} \end{aligned}$$

Based on this calculation, the potential emissions after the control are less than the allowable emissions, therefore, this rotary dryer complies with the rule.

Screening Process: (P =1 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (1)^{0.67} \\ &= 4.10 \text{ lb/hr} \\ &= 17.95 \text{ tons/hr} \end{aligned}$$

Based on this calculation, the potential emissions after the control are less than the allowable emissions, therefore screening process complies with the rule.

326 IAC 8-1-6 (General Reduction Requirement)

The facility (rotary dryer) is subject to this rule, because facility has potential to emit more than 25 tons per year of volatile organic compound (VOC). Pursuant to this rule, owner / operator of this facility shall reduce VOC emissions using the best available control technology (BACT).

No other 326 IAC 8 rules apply to this source.

BACT for Rotary Dryer:

The company will use an afterburner identified as AB-1 to control volatile organic compounds (VOC) at the rotary dryer. The OAM has determined this to be the best available control technology (BACT) for the facility. The afterburner shall be used at all times that the rotary dryer is in operation. When operating, the afterburner shall maintain at a minimum burner operating temperature and fan amperages as determined from the compliance test.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

The wire reclamation system, rotary dryer and screener has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the wire reclamation system, rotary dryer and screener stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) The Permittee shall record the total static pressure drop across the bags of all baghouses (ID # C-1, M-1, C-2) at least once per shift when the wire reclamation system and screener are in operation respectively. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across for all the baghouses (ID # C-1, M-1, C-2) shall be maintained within the range of 3.0 to 5.0 inches of water. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
- (c) The Permittee shall take readings of the total static pressure drop of the cyclones (ID# # CY-1 and CY-2, at least once per shift. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the cyclones shall be maintained within the range of 2.0 to 3.0 inches of water. The Preventive Maintenance Plan for the cyclones shall contain troubleshooting contingency and corrective actions for the cyclones when the pressure reading is outside of this range for any one reading.
- (d) The instrument used for determining the pressure shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (e) The gauge employed to take the pressure drop across the bags or any part of the baghouses or cyclones shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

- (f) An inspection shall be performed each calendar quarter of the baghouse. Defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.
- (g) In the event that a bag's failure has been observed:
 - (i) The affected compartments will be shut down immediately until the failed units have been replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
- (h) The after burner shall operate at all times that the rotary dryer is operated. When operating, the after burner shall maintain a minimum operating temperature determined from the compliance test to maintain a minimum 90% destruction of the volatile organic compound (VOC) captured. Minimum of 95% capture efficiency shall be maintained for the 90% destruction of the VOC.

These monitoring conditions are necessary because the baghouses for the wire reclamation process and screener; and the after burner must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 8-1-6 (General Reduction Requirements) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 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) Construction Permit Application Form Y.

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

Conclusion

The operation of this non-ferrous metal reclamation system and metal alloy chip recycling operation will be subject to the conditions of the attached proposed FESOP No. F003-8920-00283.

OmniSource Corporation
Fort Wayne, Indiana
Permit Reviewer: Manoj P. Patel

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F003-8920-00283

Appendix B: Emission Calculations
Natural Gas Combustion Afterburner (AB-1)
MM Btu/hr 0.3 - < 10
Commercial Boiler

Company Name: OmniSource Corporation
Address City IN Zip: 2511 Taylor Street, Fort Wayne, IN 46808
CP: 003 - 8920
Plt ID: 003-00057
Reviewer: Manoj P. Patel
Date: November 20,1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.0

26.3

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.2	0.2	0.01	1.3	0.1	0.3

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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**Appendix A: Emission Calculations
 Natural Gas Combustion Dryer (D-1)
 MM Btu/hr 0.3 - < 10
 Commercial Boiler**

Company Name: OmniSource Corporation
Address City IN Zip: 2511 Taylor Street, Fort Wayne, IN 46808
CP: 003 - 8920
Plt ID: 003-00057
Reviewer: Manoj P. Patel
Date: November 20,1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.7

23.7

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.1	0.1	0.01	1.2	0.1	0.2

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background And Description

Source Name:	OmniSource Corporation
Source Location:	2511 Taylor Street, Fort Wayne, Indiana 46802
County:	Allen
SIC Code:	5093
Operation Permit No.:	F003-8920-00283
Permit Reviewer:	Manoj P. Patel

On December 29, 1997, the Office of Air Management (OAM) had a notice published in the Fort Wayne General Gazette, Fort Wayne, Indiana, stating that OmniSource Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) to operate one (1) wire reclamation system and one (1) metal alloy chip recycling operation with control. The notice also stated that OAM 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.

On January 27, 1998, OmniSource Corporation submitted comments on the proposed FESOP. The summary of the comments is as follows:

1. Comment:

Section A.2(a) and A 2(a) (1) of the Draft Permit, and Permitted Emissions Units and Control Equipment section (page 1of TSD), should have the Maximum capacity of **18,000** pounds per hour instead of 12,000 pounds per hour and **two (2)** primary grinders instead of one (1) primary grinders.

OAM Response:

There are changes in the emissions calculations due to these changes. The permit has been changed accordingly.

Permitted Emission Units and Control Equipment before the change:

- (a) One (1) wire reclamation system, with a maximum capacity of 12,000 pounds of aluminum and copper per hour, consisting of the following equipment:
- (1) One (1) primary grinder identified as PG-1, three (3) secondary grinders identified as SG-1 to SG-3, with a baghouse for particulate control, identified as C-1, exhausting at one (1) stack B-2.
 - (2) Four (4) air tables identified as T-1 to T-4, particulate matter controlled by a twin cyclone identified as CY-1 and a baghouse identified as M-1, exhausting at one (1) stack, identified as B-1.

Permitted Emission Units and Control Equipment after the change:

- (a) One (1) wire reclamation system, with a maximum capacity of **18,000** pounds of aluminum and copper per hour, consisting of the following equipment:
- (1) **Two (2)** primary grinders identified as **PG-1& 2**, three (3) secondary grinders identified as SG-1 to SG-3, with a baghouse for particulate control, identified as C-1, exhausting at one (1) stack B-2.
 - (2) Four (4) air tables identified as T-1 to T-4, particulate matter controlled by a twin cyclone identified as CY-1 and a baghouse identified as M-1, exhausting at one (1) stack, identified as B-1.

2 Comment:

The existing stack height of stacks identified as B-1 and B-2 are 15 feet, which is lower than that required by 326 IAC 1-7 (Stack Height Provisions). OmniSource requests that the existing stack height of 15 ft. should be allowed and condition C.7 should be deleted.

OAM Response:

The air quality modeling analysis with existing stack height of 15 ft. shows that no National Ambient Air Quality Standards (NAAQS) violations occur. Therefore, the existing stack height shall remain 15 feet. The Proposed condition C.7, which was written as follows has been deleted:

C.7 Stack Height [326 IAC 1-7]

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

Preceding conditions have been renumbered due to deletion.

3. Comment:

OmniSource requests that an emergency reduction plan not be required.

OAM Response:

OmniSource Corporation has limited their emissions to less than 99 tons per year. The Emergency Reduction Plan requirement is applicable when a source has potential to emit one hundred (100) tons per year, or more, of any pollutant. The proposed permit condition C.15 which was written as follows has been deleted.

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within 180 days from the date on which this source commences operation).

- (c) If the ERP is disapproved by IDEM, OAM , the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM , shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM , that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

Preceding conditions have been renumbered due to deletion.

4. Comment:

OmniSource requests that pressure reading across the cyclone not be required (Section D.1.6 and D.2.11 in the draft permit and in the TSD). There are no pressure gauges on the cyclones. The company wants their baghouses operating range pressure ranges revised from **2" to 3"** of water to **½" to 5"** of water.

OAM Response:

Condition D.1.6 before the change:

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drops across the cyclone identified as CY-1, and baghouses identified as C-1 and M-1 used in conjunction with the wire reclamation process operation, at least once per shift when the wire reclamation is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the cyclone identified as CY-1 shall be maintained within the range of 2.0 to 3.0 inches of water, and baghouses identified as C-1 and M-1 shall be maintained within the range of 3.0 and 5.0 inches of water. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Condition D.1.6 after the change:

D.1.6 Parametric Monitoring

-
- (a) The Permittee shall record the static pressure drops across the baghouses identified as C-1

and M-1 used in conjunction with the wire reclamation process operation, at least once per working shift when the wire reclamation is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses identified as C-1 and M-1 shall be maintained within the range of **0.5** and **5.0** inches of water. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Condition D.2.11 before the change:

D.2.11 Parametric Monitoring for Particulate Matter (PM-10)

- (a) The Permittee shall record the total static pressure drops for the cyclone identified as CY-2 and the baghouse identified as C-2 at least once per shift when the rotary dryer is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the cyclone identified as CY-2 shall be maintained within the range of 2.0 to 3.0 inches of water. The pressure drop across the baghouse identified as C-2 shall be maintained within the range of 3.0 to 5.0 inches of water. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Condition D.2.11 after the change:

D.2.11 Parametric Monitoring for Particulate Matter (PM-10)

- (a) The Permittee shall record the static pressure drops for the baghouse identified as C-2 at least once per working shift when the rotary dryer is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse identified as C-2 shall be maintained within the range of **0.5** to **5.0** inches of water. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

5. Comment:

Specify the test method in permit condition D.2.10.

OAM Response:

The test method has been added in the permit condition D.2.10.

Condition D.2.10 before the change:

D.2.10 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 60 to 180 days after the issuance of this permit, the Permittee shall perform compliance test for volatile organic compounds (VOC) from afterburner. The test shall include,

- (a) capture efficiency
- (b) destruction efficiency
- (c) burner temperature
- (d) fan amperages

Condition D.2.10 after the change:D.2.10 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 60 to 180 days after the issuance of this permit, the Permittee shall perform compliance test for volatile organic compounds (VOC) from afterburner. **The tests shall be performed according to 326 IAC 3-2.1 (Source sampling Procedures).** The test shall include,

- (a) capture efficiency
- (b) destruction efficiency
- (c) burner temperature
- (d) fan amperages

Upon further review, the OAM has determined that the following changes are necessary in the permit conditions.

1. Condition D.1.3 before the change:D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM-10 testing utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, 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. PM-10 includes filterable and condensible PM-10.

Condition D.1.3 after the change:D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM-10 testing at **the baghouses identified as C-1 and M-1** utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, 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. **The tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures).** PM-10 includes filterable and condensible PM-10. PM₁₀ limit shall be as follows:

Process: Wire Reclamation System	PM ₁₀ Limit
Baghouse (C-1)	17.85 pound per hour total
Baghouse (M-1)	

2. Condition D.2.10 before the change:D.2.10 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 60 to 180 days after the issuance of this permit, the Permittee shall perform compliance test for volatile organic compounds (VOC) from afterburner. The test shall include,

- (a) capture efficiency
- (b) destruction efficiency
- (c) burner temperature
- (d) fan amperages

Condition D.2.10 after the change:

D.2.10 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 60 to 180 days after the issuance of this permit, the Permittee shall perform compliance test for volatile organic compounds (VOC) from afterburner. **The tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures).** The test shall include,

- (a) capture efficiency
- (b) destruction efficiency
- (c) burner temperature
- (d) fan amperages

3. Condition D.1.5 before the change:

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the bag house stack exhaust identified as B-1 and B-2 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

Condition D.1.5 after the change:

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the bag house stack exhaust identified as B-1 and B-2 shall be performed **once per working shift** during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

4. Condition D.2.13 before the change:

D.2.13 Visible Emissions Notations

- (a) Daily visible emission notations of the after burner stack exhaust identified as D-1 and baghouse stack identified as BH-1 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

Condition D.2.13 after the change:

D.2.13 Visible Emissions Notations

- (a) Daily visible emission notations of the after burner stack exhaust identified as D-1 and baghouse stack identified as BH-1 shall be performed **once per working shift** during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

5. Condition D.1.8 before the change:

D.1.8 Record Keeping Requirements

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:

- (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure for cyclone identified as CY-1 and baghouses identified as C-1 and M-1; and
 - (B) Cleaning cycle: frequency and differential pressure.

Condition D.1.8 after the change:

D.1.8 Record Keeping Requirements

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure for baghouses identified as C-1 and M-1.**

6. Condition D.1.2 before the change:

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Condition D.1.2 after the change to specify the units affected:

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the one (1) wire reclamation facility and the baghouses identified as C-1 and M-1, cyclone identified as CY-1.**

7. Condition D.2.7 before the change:

D.2.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Condition D.2.7 after the change to specify the units affected:

D.2.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **one (1) rotary dryer identified as D-2 and the cyclone identified as CY-2 and an after burner identified as AB-1, one (1) screener and the bag house identified as C-2.**

8. Condition D.2.15 before the change:

D.2.15 Record Keeping Requirements

- (b) To document compliance with Condition D.2.11, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure for cyclone identified as CY-1 and baghouses identified as C-1 and M-1; and

- (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Condition D.2.15 after the change:

D.2.15 Record Keeping Requirements

- (b) To document compliance with Condition D.2.11, the Permittee shall maintain the following:
- (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure for the baghouses identified as C-1 and M-1.**
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.