

**CONSTRUCTION PERMIT  
OFFICE OF AIR MANAGEMENT**

**Versatile Processing, Inc.  
3478 West Marble Hill Road,  
New Washington, Indiana 47162**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-077-9750-00021	
Issued by:  Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## 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

---

The Permittee owns and operates a sintering plant that manufactures carbon steel connective rods used for automotive industry.

Responsible Official: Rob Van Vliet  
Source Address: 3478 West Marble Hill Road, New Washington, Indiana, 47162  
Mailing Address: 2130 Stout Field West Drive, Indianapolis, Indiana 46241  
SIC Code: 5093  
County Location: Jefferson  
County Status: Attainment for all criteria pollutants  
Source Status: Minor Source

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

---

This stationary source consists of the following:

one (1) plastic coated wire metal and plastic recovery operation with a maximum design processing rate of 4,000 pounds of plastic coated wire per hour including:

- (a) one (1) wire shredding process,
- (b) one (1) magnet separation process,
- (c) one (1) granulating process with PM and PM10 emissions exhausted to Carter Day baghouse (PC-1), and
- (d) one (1) metal/plastic separation and sizing process with PM and PM10 emissions exhausted to Carter Day baghouse (PC-1)

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source will not be required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because all pollutant potential to emit emissions are less than the Part 70 major source levels.

## SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

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 2-1-3.4]

#### B.1 General Construction Conditions

---

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
- (b) 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.

**B.2 Effective Date of the Permit [IC13-15-5-3]**

---

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

**B.3 Revocation of Permits [326 IAC 2-1-9(b)]**

---

Pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

**B.4 Permit Review Rules [326 IAC 2]**

---

Notwithstanding Construction Condition No.B.5, all requirements and conditions of this construction permit 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).

**B.5 First Time Operation Permit [326 IAC 2-1-4]**

---

This document shall also become a first-time operation 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 the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction 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) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
- (e) The Permittee is subject to the requirement of Part 70 permit. The facilities in this application shall be incorporated in the Part 70 permit application to be submitted.

**Operation Conditions**

**B.6 General Operation Conditions**

---

- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- (b) The Permittee shall 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 (IC13-17) and the rules promulgated thereunder.

**B.7. Preventive Maintenance Plan [326 IAC 1-6-3]**

---

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
- (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
- (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

**B.8 Transfer of Permit [326 IAC 2-1-6]**

---

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

- (a) In the event that ownership of this plastic coated wire metal and plastic recovery operation is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) The OAM shall reserve the right to issue a new permit.

**B.9 Permit Revocation [326 IAC 2-1-9]**

---

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

**B.10 Availability of Permit [326 IAC 2-1-3(l)]**

---

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitation and Standards

#### C.1 Opacity Limitations [326 IAC 5-1-2]

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

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

#### C.2 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.3 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 326 IAC 9-1-2.

#### C.4 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.5 Operation of Equipment

All air pollution control equipment listed in this permit shall be in placed or 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.6 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

#### C.7 Performance Testing [326 IAC 3-6]

- (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

### C.8 Compliance Monitoring

---

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 Branch, 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 the 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.

### C.9 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.10 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [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 ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:

- (A) asbestos removal or demolition start date;
- (B) removal or demolition contractor; or
- (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.

#### C.11 Risk Management Plan

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.12 Compliance Monitoring Plan - Failure to Take Corrective Action

- (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.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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**

#### **C.14 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 stated in (a) above.

### **C.15 General Record Keeping Requirements**

---

- (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.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### **Stratospheric Ozone Protection**

#### **C.16 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 CONDITIONS

one (1) plastic coated wire metal and plastic recovery operation with a maximum design processing rate of 4,000 pounds of plastic coated wire per hour including:

- (a) one (1) wire shredding process,
- (b) one (1) magnet separation process,
- (c) one (1) granulating process with PM and PM10 emissions exhausted to Carter Day baghouse (PC-1), and
- (d) one (1) metal/plastic separation and sizing process with PM and PM10 emissions exhausted to Carter Day baghouse (PC-1)

### Emissions Limitation and Standards

#### D.1.1 PM Process Operation [326 IAC 6-3]:

The following facilities shall have a PM emission limit using the following equation:

For process weight rate up to 60,000 lb/hr, the following equation is used.

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

This equation is used for process weight rate up to 60,000 lb/hr

Where:

- E = PM emissions limit in pounds per hour
- P = Process weight rate in tons per hour

Process/Facility	Process Weight (ton/hr)	Allowable PM Emissions (lb/hr)
Granulator and Metal/Plastic Separation and Sizing Processes	2.0	6.5

The above PM emission limits shall also be equivalent to PM10 emission limits.

#### D.1.2 Preventive Maintenance Plan

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

### Compliance Monitoring Requirements

#### D.1.3 Baghouses Operating Condition

Baghouse PC-1 shall be operated at all times when the plastic coated wire metal and plastic recovery operation is in operation and exhausting to the outside atmosphere.

#### D.1.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the wire recovery operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### **D.1.5 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 and Reporting Requirements**

##### **D.1.6 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of the results of the inspections required and the dates the vents are redirected.
- (b) 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

### Technical Support Document (TSD) for New Construction and Operation

#### Source Background and Description

Source Name: Versatile Processing, Inc.  
 Source Location: 3478 West Marble Hill Road, New Washington, IN 47162  
 County: Jefferson  
 Construction Permit No.: CP-077-9750-00021  
 SIC Code: 5093  
 Permit Reviewer: Don Poole

The Office of Air Management (OAM) has reviewed an application from Versatile Processing, Inc. relating to the following equipment:

one (1) plastic coated wire metal and plastic recovery operation with a maximum design processing rate of 4,000 pounds of plastic coated wire per hour including:

- (a) one (1) wire shredding process,
- (b) one (1) magnet separation process,
- (c) one (1) granulating process with PM and PM10 emissions exhausted to Carter Day baghouse (PC-1), and
- (d) one (1) metal/plastic separation and sizing process with PM and PM10 emissions exhausted to Carter Day baghouse (PC-1).

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
PC-1	Granulator and Metal/Plastic Separation and Sizing Processes	21	2.17	14,130	Ambient

#### Enforcement Issue

There are no enforcement issues regarding the proposed source.

#### Recommendation

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

Information used in this review was derived from the application submitted by the applicant.

An application requesting the relocation of Indianapolis Wire Recovery to 3478 West Marble Hill Road in New Washington, Indiana was received on May 4, 1998.

**Emissions Calculations**

See Attached.

**Total Potential and Allowable Emissions:**

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)	28.5	28.7
Particulate Matter (PM10)	N/A	28.7
Sulfur Dioxide (SO <sub>2</sub> )	0.0	0.0
Volatile Organic Compounds (VOC)	0.0	0.0
Carbon Monoxide (CO)	0.0	0.0
Nitrogen Oxides (NO <sub>x</sub> )	0.0	0.0
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. See attached spreadsheets for detailed calculations.

326 IAC 6-3 (Process Operations PM Allowable Emissions)  
 This rule mandates a PM limit using the following equation:

For process weight rate up to 60,000 lb/hr, the following equation is used.

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

This equation is used for process weight rate up to 60,000 lb/hr

Where:

- E = PM emissions limit in pounds per hour
- P = Process weight rate in tons per hour

Process/Facility	Process Weight (ton/hr)	PM Allowable Emissions (lb/hr)	Allowable PM Emissions (lb/hr)
Metal/Plastic Recovery Operation	2.0	6.5	28.5

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

- (c) Allowable emissions (as defined in the Indiana Rule) of PM are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

**County Attainment Status**

Jefferson County has been classified as attainment or unclassifiable for all the criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

**Source Status**

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation):

	<u>Permit Number</u>	<u>Issued Date</u>	<u>Emissions After Control</u>
1.	CP077-9750	New	PM = 4.1 ton/yr
2.	Total		PM = 4.1 ton/yr

This proposed source is **not** a major stationary source because it is not one of the 28 listed source categories and it does not emit 250 tons per year or greater of any regulated pollutants.

**Proposed Source**

PTE from the proposed source (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 <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Source	28.7	28.7	0.0	0.0	0.0	0.0
PSD Threshold Level	250	250	250	250	250	250

This source is not major because the emissions are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This existing source has potential PM10 emissions below 100 tons per year. Therefore, it will not be subject to Part 70 Permit Program. Thus, no Part 70 operating permit is required.

**Federal Rule Applicability**

- (a) New Source Performance Standards:

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

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

The source does not emit any air toxics. Therefore, no NESHAPs 40 CFR Part 63 will apply.

**State Rule Applicability**

- (a) 326 IAC 2-6 (Emission Reporting):

This facility is not subject to 326 IAC 2-6 (Emission Reporting), because the source emits less than 100 tons/yr of Particulate Matter Less Than Ten Microns (PM10).

- (b) 326 IAC 6-3-2 (Process Operations: PM Emissions Limitations)

The source is subject this rule, which mandates a PM emissions limitations using the following equation:

For process weight rate up to 60,000 lb/hr, the following equation is used.

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

This equation is used for process weight rate up to 60,000 lb/hr

Where:

- E = PM emissions limit in pounds per hour  
P = Process weight rate in tons

Process/Facility	Process Weight (ton/hr)	PM Allowable Emissions (lb/hr)	PM Allowable Emissions (lb/hr)
Metal/Plastic Recovery Operation	2.0	6.5	28.5

The source is in compliance with this limit because the PM emissions from this source, before controls, is 6.5 lb/hr which does not exceed the allowable level.

Since the PM and PM10 emissions “before” controls (28.7 tons/yr or 6.5 lbs/yr) are at levels that do not require use of controls to meet the applicable rule requirements or to stay below any higher level permit thresholds, no stack testing or reporting shall be required. In addition, compliance monitoring will consist only of a quarterly baghouse bag inspection, operating the baghouse at all times the wire recovery operation is in operation, and provisions requiring that in the event of a broken bag or baghouse failure is detected, appropriate actions will be taken.

Record keeping shall be required to the extent that compliance with the baghouse inspection provisions are demonstrated.

It is noted that although no stack testing is required at this time, the Office of Air Management (OAM) does, as with all permitted sources, reserve the right to request compliance stack testing should the OAM determine that such testing is necessary.

### **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 proposed source.

### **Additional Comments**

On Tuesday, May 19, 1998, Dave Jordan called to check on the status of the proposed Versatile Processing, Inc. application. During the conversation, it was mentioned that based on the emission calculations, a state construction permit was required instead of a registration. In response, Mr. Jordan stated that the emission calculations do not take into account the fact that there is an inherent physical limitation on the proposed process. Thus, he submitted the following explanation:

The daily operation of the wire shredder is limited to a maximum of 18 hours per day due to the time involved to change out the shredder knives. It takes at least 6 hours to replace the dull knives with sharp knives. The shredder operation can be as long as 18 hours in operation, and then 6 hours of knife change, in a 24 hour period. The knives must be changed at this frequency, since dull knives tend to bend wire instead of cutting, creating a jam in the shredder. The shredder often operates less than 18 hours per day since knife wear will vary with the type and size of wire being shredded.

In response to the above explanation, it is concluded that the above is a statement that does not guarantee that the production will be physically limited to 18 hours per day due to the fact that the Office of Air Management has no means of determining if the knives are being changed every 18 hours. In order to ensure 18 hours of production in lieu of a manufacturer's statement of a physical limitation would require a limitation of the hours of operation or a condition requiring that the knives be changed every 18 hours with six hours of down time, both of which are conditions that can only be placed in a state construction permit.

Thus, Versatile Processing shall be issued a state construction permit.

### **Conclusion**

The construction of the plastic coated wire metal and plastic recovery operation will be subject to the conditions of the attached proposed **Construction Permit No. CP-077-9750-00021**.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for New Construction and Operation

Source Name: Versatile Processing, Inc.  
Source Location: 3478 West Marble Hill Road, New Washington, IN 47162  
County: Jefferson  
Construction Permit No.: CP-077-9750-00021  
SIC Code: 5093  
Permit Reviewer: SDF

On July 9, 1998, the Office of Air Management (OAM) had a notice published in the Madison Courier, Madison, Indiana, stating that Versatile Processing, Inc. had applied for a construction permit to construct and operate one (1) plastic coated wire metal and plastic recovery operation. The notice also stated that OAM proposed to issue a permit for this installation 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 August 17, 1998, Dave Jordan, on behalf of Versatile Processing, Inc., submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

#### **Comment 1:**

IDEM's computation of allowable emissions for the equipment is based, in part, on the presumption that the wire processing equipment can operate as much as 8,760 hours per year. As indicated in its application, Versatile is not able to operate the wire processing equipment on a continuous basis, as the equipment must be taken out of service on a regular basis for cleaning. In its TSD, (Page 5 of 5, Additional Comments), IDEM acknowledges Versatile's statement regarding its potential for continuous operation, however it concludes that the statement cannot be used as a demonstration that the equipment is physically limited, lacking a statement from the manufacturer. According, Versatile wishes to provide IDEM with two additional documents related to the issue:

- (a) Letter from Triple/s Dynamics, Inc. concerning estimated downtime for the proper equipment operation (which indicates that equipment should operate no more than 70% of the time, due to scheduled maintenance), and
- (b) a summary of actual operating logs from a similar operation that shows the percent of time equipment was available over actual operating years 1989 through 1995. This shows an overall equipment availability of 70.7% over these periods.

Versatile Processing, Inc. thus requests that this source be registered instead of permitted.

#### **Response 1:**

The Office of Air Management has reviewed the submitted comment and the permit as proposed and responds to the comment as follows:

As indicated in the comment, the 8,760 hour/yr issue was addressed in the original TSD, (Page 5 of 5, Additional Comments). This section of the TSD acknowledged the fact that there would be down time for maintenance, but also stated that there would be no means of determining if the maintenance time would occur every 18 hours or if the down time would be 6 hours. In addition, the TSD stated that there was no manufacturer's statement that demonstrated the above, either. Thus, the OAM concluded that operation based on 8,760 hours per year would be used.

Versatile Processing, Inc. submitted two additional items as demonstrations of consistent down time; a letter from the manufacturer stating that the down time should be no more than 70% of the time, and a summary of actual operating logs from a similar operation that shows the percent down time being an average of 70.7%.

IDEM looks at the potential emissions for a facility on a theoretical basis. IDEM realizes that the actual emission rate, in most cases, will be less than the theoretical potential.

For IDEM to take the downtime into account, the downtime would have to be an inherent physical limitation on the facility. These types of limitations which effectively "bottleneck" an operation can be used to adjust potential calculations.

But in this case, the proposed "inherent physical limitation" is not actually that. It is more an estimate of possible downtime, which does not affect the maximum hourly production rate of the facility. Thus, it cannot be taken into account.

The use of the downtime estimates do not prevent the facility from operating at some higher rate on a "good day" of operation.

Thus, no changes will be made.

Mail to: Permit Administration & Development Section  
Office Of Air Management  
100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015

Versatile Processing, Inc.  
2130 Stout Field West Drive  
Indianapolis, Indiana 46241

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that, Versatile Processing, Inc., 3478 West Marble Hill Road, New Washington, IN 47162 has constructed the following:  
one (1) plastic coated wire metal and plastic recovery operation with a maximum design processing rate of 4,000 pounds of plastic coated wire per hour including:
  - (a) one (1) wire shredding process,
  - (b) one (1) magnet separation process,
  - (c) one (1) granulating process with PM and PM10 emissions exhausted to Carter Day baghouse (PC-1), and
  - (d) one (1) metal/plastic separation and sizing process with PM and PM10 emissions exhausted to Carter Day baghouse (PC-1)in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on May 4, 1998 and as permitted pursuant to **Construction Permit No. CP-077-9750, Plant ID No. 077-00021** issued on \_\_\_\_\_

Further Affiant said not.

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_.

My Commission expires: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

# Emission Calculations

Versatile Processing, Inc.

Versatile Processing, Inc. has submitted an application to relocate the Indianapolis Wire Recovery Facility to a new location in Jefferson County.

Versatile Processing, Inc. is a plastic coated wire metal recovery operation that shreds plastic coated wire and separates the metal from the plastic. The emissions generated from this operation are particulate matter (PM) and PM10. There are no hazardous air pollutants (HAP) generated. The following calculations determine the potential to emit (PTE), the allowable and actual emissions, and the potential emissions after controls.

## Potential to Emit (PTE):

The emissions generated by this source are from the granulator and separation and sizing units. The following calculations determine the PM and PM10 PTE from this source based on a maximum plastic loading of 938 lb/hr, a baghouse efficiency of 99.9%, 0.006 lb PM per lb plastic collected, and 8,760 hours of operation.

### A. PM PTE:

#### 1. PM Collected by the Baghouse:

$$(938 \text{ lb plastic/hr} * 0.999) * 0.006 \text{ lb PM/lb plastic} * 1/2000 \text{ ton PM/lb PM} * 8760 \text{ hr/yr} = 24.6 \text{ ton PM/y}$$

#### 2. PM Emitted Out of the Baghouse:

$$(938 \text{ lb PM/hr} * 0.001) * 1/2000 \text{ ton PM/lb PM} * 8760 \text{ hr/yr} = 4.1 \text{ ton PM/yr}$$

#### 3. Total PM PTE:

The total PM PTE is the sum of the PM collected plus the PM emitted:

$$24.6 \text{ ton PM/yr} + 4.1 \text{ ton PM/yr} = 28.7 \text{ ton PM/yr}$$

### B. PM10 PTE:

PM is determined to be equal to PM10. Thus, the PTE for PM10 emissions are 28.7 tons per year

## **Allowable Emissions:**

### **A. Allowable PM Emissions:**

This plastic coated wire metal recovery operation is subject to 326 IAC 6-3-2, PM emission limitations for process operations. Pursuant to this rule, the allowable PM emissions for an operation with a maximum rated capacity of 2 ton/hr is determined to be 6.5 lb PM/hr or 28.5 ton PM/yr based on 8,760 hours of operation.

$$E = 4.10 * (2 \text{ ton materials/hr})^{0.67} = 6.5 \text{ lb PM/hr}$$

$$6.5 \text{ lb PM/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton PM/lb PM} = 28.5 \text{ ton PM/yr}$$

## **Actual Emissions:**

### **A. Actual PM Emissions:**

The actual PM emissions are the PM emissions exhausted out of the baghouse. These emissions are determined based on an efficiency of 99.9%, emissions after controls, and 6552 hours of operation.

$$18 \text{ hr/day} * 7 \text{ day/week} * 52 \text{ weeks/yr} = 6552 \text{ hr/yr}$$

$$(938 \text{ lb PM/hr} * 0.001) * 1/2000 \text{ ton PM/lb PM} * 6552 \text{ hr/yr} = 3.1 \text{ ton PM/yr}$$

### **B. Actual PM10 Emissions:**

As previously stated, the PM10 emissions are equal to the PM emissions. Thus, the actual PM10 emissions are also 3.1 ton/yr.

## **Potential Emissions After Controls:**

### **A. PM Emissions After Controls:**

The following calculations determine the after controls PM and PM10 emissions from this source based on a maximum plastic loading of 938 lb/hr, a baghouse efficiency of 99.9%, emissions after controls, and 8,760 hours of operation.

$$(938 \text{ lb/hr} * 0.001) * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = 4.1 \text{ tons PM/yr}$$

**B. PM10 Emissions After Controls:**

As previously stated, the PM10 emissions are equal to the PM emissions. Thus, the after controls PM10 emissions are also 4.1 ton/yr.

**Emission Summary:**

The following is a summary of the above emission calculations:

	<b>PM ton/yr</b>	<b>PM10 ton/yr</b>
PTE	28.7	28.7
Allowable	28.5	N/A
Actual	3.1	3.1
Potential After Controls	4.1	4.1

**Rule Applicability:**

**326 IAC 2-2 Prevention of Significant Deterioration (PSD) Requirements:**

The potential emissions after controls (4.1 ton PM/yr) are less than applicable level of 250 tons per year. Thus, 326 IAC 2-2 is not applicable in this case.

**326 IAC 2-1-3 State Construction Permits:**

Pursuant to 326 IAC 2-1-3, sources with allowable emissions of twenty-five (25) tons per year of any regulated pollutant shall obtain a construction permit. Since the allowable PM emissions are determined to be 28.5 tons per year which exceeds the applicability level, this source shall be issued a state construction permit under 326 IAC 2-1-3.

Since the PTE (28.7 tons PM10/yr) are less than the Part 70 thresholds (100 tons per year), this source is not subject to the requirements of Part 70.

**326 IAC 2-6-1 Emission Reporting:**

The PTE from this source (28.7 tons PM10/yr) is less than the applicable level of 100 tons per year. Thus, 326 IAC 2-6 is not applicable in this case.

**326 IAC 4-1 Open Burning:**

This source is subject to 326 IAC 4-1, Open Burning. Pursuant to this rule, 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 5 Opacity Limitations:**

This source is subject to 326 IAC 5-1-2, opacity limitations. Pursuant to this rule, except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

**326 IAC 6-3-2 PM Emission Limitations for Process Operations:**

This source is subject to 326 IAC 6-3-2. Pursuant to this rule, the allowable PM emissions for an operation with a maximum capacity of 2 tons/hr is determined to be 6.5 lb PM/hr or 28.5 ton PM/yr.

$$E = 4.10 * (2 \text{ ton materials/hr})^{0.67} = 6.5 \text{ lb PM/hr}$$

$$6.5 \text{ lb PM/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton PM/lb PM} = 28.5 \text{ ton PM/yr}$$

Based on the above calculations, the PM emissions "before" use of controls is determined to be 6.5 lb/hr which does not exceed the allowable level of 6.5 lb PM/hr. Thus, compliance with this limitation is determined to be achieved.

$$28.7 \text{ tons PM/yr} * 1/8760 \text{ yr/hr} * 2000 \text{ lb/ton} = 6.5 \text{ lb/hr}$$

The PM/PM10 emissions after controls are determined to be 0.01 lb PM/hr.

$$(28.7 \text{ tons PM/yr} * 0.001) * 1/8760 \text{ yr/hr} * 2000 \text{ lb/ton} = 0.01 \text{ lb PM/hr}$$

Since the PM and PM10 emissions "before" controls (28.7 tons/yr or 6.5 lbs/hr) are at levels that do not require use of controls to meet the applicable rule requirements or to stay below any higher level permit thresholds, no stack testing or reporting shall be required. In addition, compliance monitoring will consist only of a quarterly baghouse bag inspection, operating the baghouse at all times the wire recovery operation is in operation, and provisions requiring that in the event of a broken bag or baghouse failure is detected, appropriate actions will be taken.

Record keeping shall be required to the extent that compliance with the baghouse inspection provisions are demonstrated.

It should be noted that although no stack testing is required at this time, the Office of Air Management (OAM) does, as with all permitted sources, reserve the right to request compliance stack testing should the OAM determine that such testing is necessary.

**326 IAC 12 (40 CFR 60) New Source Performance Standards (NSPS):**

There are no NSPS that apply to this source.