NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

and

NOTICE OF PUBLIC MEETING

Preliminary Findings Regarding a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

for Pine Cone Recycling, LLC in Elkhart County

FESOP No.: F039-41354-00852

The Indiana Department of Environmental Management (IDEM) has received an application from Pine Cone Recycling, LLC, located at 59697 County Road 7, Elkhart, IN 46517, for a new source construction and FESOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Pine Cone Recycling, LLC to construct and operate a new stationary wood and drywall grinding facility.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit regulated pollutants will be limited to less than the TV and/or PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

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

Elkhart Public Library
300 South 2nd Street
Elkhart, IN 46516

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

You are invited to attend a public meeting:

The Indiana Department of Environmental Management (IDEM) will hold a public meeting to discuss air permitting for Pine Cone Recycling, LLC on:

Thursday, September 12, 2019 at 5:30 pm
Elkhart Central High School Auditorium
1 Blazer Blvd
Elkhart IN 46516

What will happen at the meeting?
IDEM staff will describe the draft Pine Cone Recycling, LLC air permit and answer questions from citizens in an informal setting. The public meeting will not include formal presentations, but will give the public an opportunity to ask questions, make statements, and discuss air pollution concerns with IDEM staff.

Written comments and supporting documentation can be presented at the public meeting, or if you do not plan to attend this meeting, you can send written comments to IDEM before the end of the public notice period. All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials. If you do not want to comment, but would like to be added to IDEM’s mailing list to receive notice of future action related to this permit application, please contact IDEM. Please refer to permit number F039-41354-00852 in all correspondence.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F039-41354-00852 in all correspondence.

Comments should be sent to:

L. David Cohen
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for L. David Cohen or (317) 233-0178
Or dial directly: (317) 233-9327
Fax: (317) 232-6749 attn: L. David Cohen
E-mail: LCohen@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
What will happen after IDEM makes a decision?

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

If you have any questions, please contact L. David Cohen of my staff at the above address.

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality
New Source Construction and Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

Pine Cone Recycling, LLC
59697 County Road 7
Elkhart, Indiana  46517

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 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.

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.
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SECTION A  SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary wood and drywall grinding facility.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>59697 County Road 7, Elkhart, Indiana 46517</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(574) 293-3751</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2499 (Wood Products, Not Elsewhere Classified)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Elkhart</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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) receiving station, approved in 2019 for construction, with a maximum capacity of 80,000 pounds of wood waste and drywall waste combined per hour, unloaded onto the tipping floor inside the waste processing area of the building, with no controls and exhausting indoors.

(b) The following emissions units and processes exhausting to Stack S-1:

(1) Waste Material Processing Operations on Line 1 including:

(A)  One (1) Rotochopper horizontal grinder for drywall and wood waste, identified as GR-1, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

(B)  One (1) Rotochopper hammermill for wood waste, identified as HM-1, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

(2) Waste Material Processing Operations on Line 2 including:

(A)  One (1) Rotochopper horizontal grinder for wood waste, identified as GR-2, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

(B)  One (1) Rotochopper hammermill for wood waste, identified as HM-2, approved in 2019 for construction, with a maximum capacity of 20 tons
per hour, using a high efficiency cyclone C-1 as control, and exhausting

to stack S-1.

[Note: Ground wood from the hammermills is extracted by air flow supplied by the cyclone up
into an enclosed neutral air plenum (product separator). The ground wood then falls down
into a sealed auger that pushes the ground wood onto an inclined rubber belt conveyor to
begin the Conveying process to the ground wood storage areas identified in Section A.2(d)
below.

Ground drywall (gypsum) is diverted off Line 1 prior to the hammermills as identified in
Section A.2(c) below]

(c) One (1) ground drywall (gypsum) drop point off Line 1 into a covered container inside a
waste processing area of the manufacturing building, approved in 2019 for construction,
with a maximum capacity of 6,000 pounds per hour of gypsum, with no controls and
exhausting indoors.

(d) One ground wood material conveying process, identified as CONVEY, approved for in
2019 for construction, including two (2) drop points for mechanical conveying of ground
wood from the hammermills to storage areas inside the building, identified as Drop Points
#1 and #2, each with a maximum capacity of 68,000 pounds of ground wood per hour,
with no controls and exhausting indoors.

(e) One (1) ground wood material loading process, identified as LOAD, approved for in 2019
for construction, including loading of ground wood via front-end loaders into trucks inside
the building, with a maximum combined capacity of 68,000 pounds of ground wood per
hour, with no controls and exhausting indoors.

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

This stationary source also includes the following insignificant activities:

(a) Two (2) natural gas-fired heaters, identified as Heater #1 and Heater #2, constructed in
2019, with a maximum heat input capacity of 1.00 MMBtu/hr each, using no control.

(b) Unpaved roads

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

This stationary source, otherwise required to have a Part 70 permit as described in
326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM),
Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).
SECTION B GENERAL CONDITIONS

B.1 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F 039-41354-00852, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
B.7 Severability [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.8 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.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 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 initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

(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, OAQ, on or before the date it is due.
(c) The annual compliance certification report shall include the following:

(1) The appropriate 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, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ 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.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.
(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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 describe 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, OAQ, or Northern Regional Office 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
   Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

   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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ 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, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance 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 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F 039-41354-00852 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,
(2) revised, or
(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.16 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.17 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 Federally Enforceable State Operating Permit 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)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ 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, OAQ 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, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 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, OAQ 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) and 326 IAC 2-7-1(42). The renewal application does require a
certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a 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 2-8-11.1 has been obtained;
(3) The changes do not result in emissions which exceed the limitations provided in 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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5  
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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at 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(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
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, OAQ or U.S. EPA is required.

(d) 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.21 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:
(a) Enter upon the Permittee’s premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.
B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

### Entire Source

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

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

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

**C.2 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, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  2. The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  3. The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

- **(b)** Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

- **(c)** 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 not exceed the above specified limits.

- **(d)** Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.3 Opacity [326 IAC 5-1]**

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

- **(a)** Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.
Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

C.12 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(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, OAQ 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]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.
(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

( AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.

(BB) The dates analyses were performed.

(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.
These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

Stratospheric Ozone Protection

C.18 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 applicable standards for recycling and emissions reduction.
EMISSIONS UNIT OPERATION CONDITIONS

SECTION D.1

Emissions Unit Description:

(a) One (1) receiving station, approved in 2019 for construction, with a maximum capacity of 80,000 pounds of wood waste and drywall waste combined per hour, unloaded onto the tipping floor inside the waste processing area of the building, with no controls and exhausting indoors.

(b) The following emissions units and processes exhausting to Stack S-1:

(1) Waste Material Processing Operations on Line 1 including:

(A) One (1) Rotochopper horizontal grinder for drywall and wood waste, identified as GR-1, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

(B) One (1) Rotochopper hammermill for wood waste, identified as HM-1, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

(2) Waste Material Processing Operations on Line 2 including:

(A) One (1) Rotochopper horizontal grinder for wood waste, identified as GR-2, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

(B) One (1) Rotochopper hammermill for wood waste, identified as HM-2, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

[Note: Ground wood from the hammermills is extracted by air flow supplied by the cyclone up into an enclosed neutral air plenum (product separator). The ground wood then falls down into a sealed auger that pushes the ground wood onto an inclined rubber belt conveyor to begin the Conveying process to the ground wood storage areas identified in Section A.2(d) below.

Ground drywall (gypsum) is diverted off Line 1 prior to the hammermills as identified in Section A.2(c) below]

(c) One (1) ground drywall (gypsum) drop point off Line 1 into a covered container inside a waste processing area of the manufacturing building, approved in 2019 for construction, with a maximum capacity of 6,000 pounds per hour of gypsum, with no controls and exhausting indoors.

(d) One ground wood material conveying process, identified as CONVEY, approved for in 2019 for construction, including two (2) drop points for mechanical conveying of ground wood from the hammermills to storage areas inside the building, identified as Drop Points #1 and #2, each with a maximum capacity of 68,000 pounds of ground wood per hour, with no controls and exhausting indoors.
(e) One (1) ground wood material loading process, identified as LOAD, approved for in 2019 for construction, including loading of ground wood via front-end loaders into trucks inside the building, with a maximum combined capacity of 68,000 pounds of ground wood per hour, with no controls and exhausting indoors.

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

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

D.1.1 FESOP and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

(a) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(1) The emissions of PM10 from Stack S-1 shall not exceed 15.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The emissions of PM2.5 from Stack S-1 shall not exceed 15.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(1) The emissions of PM from Stack S-1 shall not exceed 15.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Compliance with the above limits, combined with the potential to emit PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Air Quality Requirements [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-1.1-5, the Permittee shall comply with the following:

(a) The PM10 emissions from Stack S-1 shall be less than 30.14 pounds per 24 consecutive hour period.

(b) The PM2.5 emissions from Stack S-1 shall be less than shall be less than 22.14 pounds per 24 consecutive hour period.

(c) Shall comply with the following Fugitive Dust Control Plan:

(1) Any unpaved roads associated with the wood waste and drywall processing operation shall be watered or the Permittee shall use a chemical suppressant according to manufacturer's specifications on an as needed basis, in order to
control emissions of PM, PM10 and PM2.5 and to assure no visible emissions from the unpaved roads.

(2) The wet or chemical suppression shall be applied at a frequency of once every four (4) hours except for the following time periods:

(i) During precipitation.

(ii) When ambient air temperature is at or below freezing temperature.

D.1.3 Stack Height [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-1.1-5(1) and (5) (Air Quality Requirements), the stack height of Stack S-1 shall not be less than 37 feet.

D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the facilities listed in the following table shall not exceed the pound per hour value, when operating at the specified process weight rate:

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>P (ton/hr)</th>
<th>326 IAC 6-3-2 Allowable PM Emission Rate, E (lb/hr)</th>
<th>Uncontrolled Potential PM Emissions (lb/hr)</th>
<th>Controlled Potential PM Emissions (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Processing / GR-1, GR-2, HM-1, and HM-2</td>
<td>40</td>
<td>42.53</td>
<td>65.47</td>
<td>5.24</td>
</tr>
<tr>
<td>Conveying of Sawdust / CONVEY</td>
<td>40</td>
<td>42.53</td>
<td>40.00</td>
<td>40.00</td>
</tr>
<tr>
<td>Transfer of Sawdust / LOAD</td>
<td>40</td>
<td>42.53</td>
<td>40.00</td>
<td>40.00</td>
</tr>
</tbody>
</table>

These pounds per hour limitations were calculated with the following equation:

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

\[ E = 55.0 \cdot P^{0.11} - 40 \]

where \( E \) = rate of emission in pounds per hour; and \( P \) = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4 (9)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.6 Particulate control

In order to assure compliance with Conditions D.1.1, D.1.2, and D.1.4, the cyclone C-1 for particulate control shall be in operation and control emissions from the waste processing operations (GR-1, GR-2, HM-1, and HM-2) at all times that any of the grinders (GR-1 and GR-2) and/or any of the hammermills (HM-1 and HM-2) are in operation.
D.1.7 PM10 and PM2.5 [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-1.1-5(1) and (5) (Air Quality Requirements) and in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform the following calculations:

(1) PM10 (lb/24 consecutive hours)

\[ \text{PM10} = \text{EF of PM10 (drywall)} \times \text{Total Drywall processed (lb/24-hr)} + \text{EF of PM10 (wood waste)} \times \text{Total Wood Waste processed (lb/24-hr)} \]

(2) PM2.5 (lb/24 consecutive hours)

\[ \text{PM2.5} = \text{EF of PM2.5 (drywall)} \times \text{Total Drywall processed (lb/24-hr)} + \text{EF of PM2.5 (wood waste)} \times \text{Total Wood Waste processed (lb/24-hr)} \]

(3) where,

until emission factors are determined in a valid stack test, the following emission factors shall be used:

- EF of PM10 (drywall) = 0.47 lb/ton
- EF of PM2.5 (drywall) = 0.47 lb/ton
- EF of PM10 (wood waste) = 0.014 lb/ton
- EF of PM2.5 (wood waste) = 0.007 lb/ton

(4) For any 24 consecutive hour period during which Drywall is not processed, the source may calculate emissions based on a 24 hour day.

D.1.8 Testing Requirements [326 IAC 2-1.1-11]

(a) Not later than 180 days after the startup of Line 1 (GR-1 and HM-1), the Permittee shall perform PM10 and PM2.5 testing when processing wood waste utilizing methods approved by the commissioner. The test shall be repeated at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

PM10 and PM2.5 includes filterable and condensable PM.

(b) Not later than 180 days after the start of drywall processing in Line 1 (GR-1), the Permittee shall perform PM10 and PM2.5 testing when processing drywall utilizing methods approved by the commissioner. The test shall be repeated at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

PM10 and PM2.5 includes filterable and condensable PM.

(c) Not later than 180 days after the startup of Line 2 (GR2 and HM-2), the Permittee shall perform PM10 and PM2.5 testing when processing wood waste utilizing methods approved by the commissioner. The test shall be repeated at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).
Procedures).

PM$_{10}$ and PM$_{2.5}$ includes filterable and condensable PM.

(d) Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

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

D.1.9 Visible Emissions Notations

(a) Visible emission notations of cyclone stack exhausts (S-1) shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.10 Cyclone Failure Detection

In the event that a cyclone malfunction has been observed:
Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.11 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the daily and consecutive 24 hour period throughput limits established in D.1.1.

(1) The total emissions of PM, PM$_{10}$ and PM$_{2.5}$ from Stack S-1 per twelve (12) consecutive month period.

(2) The total amount of wood waste processed at the facility per day.

(3) For any 24 consecutive hour period during which Drywall has been processed, the Permittee shall maintain the additional records:

(A) The total emissions of PM$_{10}$ and PM$_{2.5}$ from Stack S-1 per consecutive
24 hour periods.

(B) The total amount of drywall processed at the facility per consecutive 24-hour period.

(C) The total amount of wood waste processed at the facility 24-hour period.

(D) Records of the day and hours drywall was processed.

(b) To document the compliance status with Condition D.1.2, the Permittee shall maintain daily records of the watering or chemical suppressant application of unpaved roads associated with the wood waste and drywall processing facility. The Permittee shall include in its daily record when watering is suspended and the reason for the suspension (e.g., the process did not operate that day or unsafe or hazardous conditions).

(c) To document the compliance status with Condition D.1.2(c), the Permittee shall maintain records of manufacturer's specifications for the chemical suppressants used for unpaved roads.

(d) To document the compliance status with Condition D.1.9, the Permittee shall maintain daily records of the visible emission notations of the emissions from the cyclone stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(e) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.12 Reporting Requirements

A quarterly report and a quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

The report does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Pine Cone Recycling, LLC
Source Address: 59697 County Road 7, Elkhart, Indiana 46517
FESOP Permit No.: F 039-41354-00852

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:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)___________________________________________________
☐ Report (specify)_______________________________________________________
☐ Notification (specify)____________________________________________________
☐ Affidavit (specify)_______________________________________________________
☐ 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:
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Pine Cone Recycling, LLC
Source Address: 59697 County Road 7, Elkhart, Indiana 46517
FESOP Permit No.: F 039-41354-00852

This form consists of 2 pages Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
  - The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

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<tr>
<th>Facility/Equipment/Operation:</th>
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<th>Permit Condition or Operation Limitation in Permit:</th>
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<th>Description of the Emergency:</th>
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<th>Describe the cause of the Emergency:</th>
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<td>If any of the following are not applicable, mark N/A</td>
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<td><strong>Date/Time Emergency started:</strong></td>
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<td><strong>Date/Time Emergency was corrected:</strong></td>
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<tr>
<td><strong>Was the facility being properly operated at the time of the emergency?</strong> Y  N Describe:</td>
</tr>
<tr>
<td><strong>Type of Pollutants Emitted:</strong> TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
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<tr>
<td><strong>Estimated amount of pollutant(s) emitted during emergency:</strong></td>
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<td><strong>Describe the steps taken to mitigate the problem:</strong></td>
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<tr>
<td><strong>Describe the corrective actions/response steps taken:</strong></td>
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<tr>
<td><strong>Describe the measures taken to minimize emissions:</strong></td>
</tr>
<tr>
<td><strong>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:</strong></td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
Source Name: Pine Cone Recycling, LLC  
Source Address: 59697 County Road 7, Elkhart, Indiana 46517  
FESOP Permit No.: F 039-41354-00852  
Facility: PM Emissions  
Parameter: Stack S-1  
Limit: The emissions of PM shall not exceed 15.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month (Condition D.1.1).

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<th>Month</th>
<th>Column 1</th>
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<th>Column 1 + Column 2</th>
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<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
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☐ No deviation occurred in this quarter.  
☐ Deviation/s occurred in this quarter.  
Deviation has been reported on: ___________________________

Submitted by: ___________________________  
Title / Position: ___________________________  
Signature: ___________________________  
Date: ___________________________  
Phone: ___________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

FESOP Quarterly Report

Source Name: Pine Cone Recycling, LLC  
Source Address: 59697 County Road 7, Elkhart, Indiana 46517  
FESOP Permit No.: F 039-41354-00852  
Facility: PM10 Emissions  
Parameter: Stack S-1  
Limit: The emissions of PM10 shall not exceed 15.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month (Condition D.1.1).

<table>
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<tr>
<th>QUARTER: _______</th>
<th>YEAR: ________________</th>
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<tr>
<th>Month</th>
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<th>Column 2</th>
<th>Column 1 + Column 2</th>
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<tr>
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<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
</tr>
</tbody>
</table>

□ No deviation occurred in this quarter.  
□ Deviation/s occurred in this quarter.  
Deviation has been reported on: ___________________________

Submitted by: _________________________________________  
Title / Position: _________________________________________  
Signature: _________________________________________  
Date: _____________  
Phone: __________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Pine Cone Recycling, LLC
Source Address: 59697 County Road 7, Elkhart, Indiana 46517
FESOP Permit No.: F 039-41354-00852
Facility: PM2.5 Emissions
Parameter: Stack S-1
Limit: The emissions of PM2.5 shall not exceed 15.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month (Condition D.1.1).

| QUARTER: ____________________ | YEAR: ____________________ |

<table>
<thead>
<tr>
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<th>Column 1 (tons)</th>
<th>Column 2 (tons)</th>
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- □ No deviation occurred in this quarter.
- □ Deviation/s occurred in this quarter.
  Deviation has been reported on: ___________________________

Submitted by: ____________________________________________
Title / Position: __________________________________________
Signature: ________________________________________________
Date: _____________________________________________________
Phone: ___________________________________________________
FESOP Quarterly Report

Source Name: Pine Cone Recycling, LLC
Source Address: 59697 County Road 7, Elkhart, Indiana 46517
FESOP Permit No.: F 039-41354-00852
Facility: Stack S-1
Parameter: PM10 and PM2.5 Emissions
Limit: The PM10 emissions from Stack S-1 shall be less than 30.14 pounds per 24 consecutive hour period.
The PM2.5 emissions from Stack S-1 shall be less than shall be less than 22.14 pounds per 24 consecutive hour period.

Quarter: Year:

<table>
<thead>
<tr>
<th>Date</th>
<th>Start Time</th>
<th>End Time (24 hrs later)</th>
<th>PM10 (lb)</th>
<th>Date</th>
<th>Start Time</th>
<th>End Time (24 hrs later)</th>
<th>PM2.5 (lb)</th>
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☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.

Deviation has been reported on: ___________________________
Submitted by: _________________________________________
Title / Position: _______________________________________
Signature: ____________________________________________
Date: ________________________________________________
Phone: _______________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Pine Cone Recycling, LLC  
Source Address: 59697 County Road 7, Elkhart, Indiana 46517  
FESOP Permit No.: F 039-41354-00852

<table>
<thead>
<tr>
<th>Months: ___________ to ____________ Year: ______________</th>
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This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
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<th>Number of Deviations:</th>
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<th>Probable Cause of Deviation:</th>
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<th>Response Steps Taken:</th>
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<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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</table>

Form Completed by:____________________________

Title / Position:______________________________

Date:_______________________________________

Phone:_______________________________________
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 ________________ (Company Name).

3. By virtue of my position with ________________, I have personal 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 Pine Cone Recycling, LLC 59697 County Road 7, Elkhart, Indiana 46517, completed construction of the wood and drywall grinding facility on ________________ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 11, 2019 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F 039-41354-00852, Plant ID No. 03-00852 issued on ________________.

Permittee, please cross out the following statement if it does not apply: Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature ______________________
Date ______________________

STATE OF INDIANA)
COUNTY OF ________________ )

Subscribed and sworn to me, a notary public in and for ________________ County and State of Indiana on this ________________ day of ________________, 20__. My Commission expires:

Signature ______________________ (typed or printed)
Name ______________________
Indiana Department of Environmental Management  
Office of Air Quality  

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

Source Description and Location

Source Name: Pine Cone Recycling, LLC  
Source Location: 59697 County Road 7, Elkhart, IN 46517  
County: Elkhart  
SIC Code: 2499 (Wood Products, Not Elsewhere Classified)  
Operation Permit No.: F 039-41354-00852  
Permit Reviewer: Luda Lang/L. David Cohen

On April 11, 2019, the Office of Air Quality (OAQ) received an application from Pine Cone Recycling, LLC related to the construction and operation of a new stationary wood and drywall grinding facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Elkhart County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2009, for the 2008 lead standard</td>
</tr>
</tbody>
</table>

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

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅
Elkhart County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
Elkhart, Indiana TSD for New Source Construction and FESOP No. 039-41354-00852
Permit Reviewer: Luda Lang/L. David Cohen

(c) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<table>
<thead>
<tr>
<th>Fugitive Emissions</th>
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Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

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

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

<table>
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<tr>
<th>Background and Description of Emission Units and Pollution Control Equipment</th>
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The Office of Air Quality (OAQ) has reviewed an application, submitted by Pine Cone Recycling, LLC on April 11, 2019, relating to the construction and operation of a new stationary wood and drywall grinding facility.

The following is a list of the new emission units and pollution control device(s):

(a) One (1) receiving station, approved in 2019 for construction, with a maximum capacity of 80,000 pounds of wood waste and drywall waste combined per hour, unloaded onto the tipping floor inside the waste processing area of the building, with no controls and exhausting indoors.

(b) The following emissions units and processes exhausting to Stack S-1:

   (1) Waste Material Processing Operations on Line 1 including:

   (A) One (1) Rotochopper horizontal grinder for drywall and wood waste, identified as GR-1, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

   (B) One (1) Rotochopper hammermill for wood waste, identified as HM-1, approved in 2019 for construction, with a maximum capacity of 20 tons
per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

(2) Waste Material Processing Operations on Line 2 including:

(A) One (1) Rotochopper horizontal grinder for wood waste, identified as GR-2, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

(B) One (1) Rotochopper hammermill for wood waste, identified as HM-2, approved in 2019 for construction, with a maximum capacity of 20 tons per hour, using a high efficiency cyclone C-1 as control, and exhausting to stack S-1.

[Note: Ground wood from the hammermills is extracted by air flow supplied by the cyclone up into an enclosed neutral air plenum (product separator). The ground wood then falls down into a sealed auger that pushes the ground wood onto an inclined rubber belt conveyor to begin the Conveying process to the ground wood storage areas identified in Section A.2(d) below.

Ground drywall (gypsum) is diverted off Line 1 prior to the hammermills as identified in Section A.2(c) below]

(c) One (1) ground drywall (gypsum) drop point off Line 1 into a covered container inside a waste processing area of the manufacturing building, approved in 2019 for construction, with a maximum capacity of 6,000 pounds per hour of gypsum, with no controls and exhausting indoors.

(d) One ground wood material conveying process, identified as CONVEY, approved for in 2019 for construction, including two (2) drop points for mechanical conveying of ground wood from the hammermills to storage areas inside the building, identified as Drop Points #1 and #2, each with a maximum capacity of 68,000 pounds of ground wood per hour, with no controls and exhausting indoors.

(e) One (1) ground wood material loading process, identified as LOAD, approved for in 2019 for construction, including loading of ground wood via front-end loaders into trucks inside the building, with a maximum combined capacity of 68,000 pounds of ground wood per hour, with no controls and exhausting indoors.

Insignificant Activities

(a) Two (2) natural gas-fired heaters, identified as Heater #1 and Heater #2, constructed in 2019, with a maximum heat input capacity of 1.00 MMBtu/hr each, using no control.

(b) Unpaved roads

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.
Permit Level Determination – FESOP

This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Unrestricted Source-Wide Emissions (ton/year)</th>
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<tbody>
<tr>
<td>PM</td>
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</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
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<tr>
<td>Title V Major Source Thresholds</td>
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<tr>
<td>PSD Major Source Thresholds</td>
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</tbody>
</table>

1Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant."
2PM2.5 listed is direct PM2.5.
3Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM10 PM2.5 are each greater than one hundred (100) tons per year. The potential to emit of all other criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

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<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
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<td>PSD Major Source Thresholds</td>
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¹ Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a “regulated air pollutant.”
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take PM, PM₁₀, and PM₂.₅ limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD), 326 IAC 2-8 (FESOP) for more information regarding the limit(s).

(a) This new stationary source is minor under Title V (326 IAC 2-7) because the potential to emit criteria pollutants and HAPs from the entire source is less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This new stationary source is minor under PSD (326 IAC 2-2) because the potential to emit of all PSD regulated pollutants from the entire source is less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for this source, because this source does not have any steam generating unit, that has heat input capacity of greater than 10 MMBtu/hr; the two (2) heaters (Heater #1 and Heater #2) are rated at 1.00 MMBtu/hr each.

(b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDDD and 326 IAC 20-95 are not included in the permit for this source, since each of the natural gas-fired combustion units is not considered an industrial, commercial, or institutional boiler or process heater as defined by §63.7575, and this source is not a major source of HAPs as defined by §63.2.
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit, since each of the natural gas-fired combustion units at this source is not considered an industrial, commercial, or institutional boiler as defined by §63.11237.

(c) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

326 IAC 2-2 (PSD), 326 IAC 2-8-4 (FESOP) and 326 IAC 2-1.1-5 (Air Quality Requirements)

PSD, and FESOP applicability are discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

FESOP and PSD Minor Source Limit(s):

(a) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(1) The emissions of PM10 from Stack S-1 shall not exceed 15.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The emissions of PM2.5 from Stack S-1 shall not exceed 15.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(1) The emissions of PM from Stack S-1 shall not exceed 15.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Compliance with the above limits, combined with the potential to emit PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

326 IAC 2-1.1-5 (Air Quality Requirements)

Pursuant to 326 IAC 2-1.1-5, the Permittee shall comply with the following:
(a) The PM10 emissions from Stack S-1 shall be less than 30.14 pounds per 24 consecutive hour period.

(b) The PM2.5 emissions from Stack S-1 shall be less than shall be less than 22.14 pounds per 24 consecutive hour period.

(c) Shall comply with the following Fugitive Dust Control Plan:

(1) Any unpaved roads associated with the wood waste and drywall processing operation shall be watered or the Permittee shall use a chemical suppressant according to manufacturer's specifications on an as needed basis, in order to control emissions of PM, PM10 and PM2.5 and to assure no visible emissions from the unpaved roads.

(2) The wet or chemical suppression shall be applied at a frequency of once every four (4) hours except for the following time periods:

   (i) During precipitation.

   (ii) When ambient air temperature is at or below freezing temperature.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, LaPorte, or Lawrenceburg Township, Dearborn County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

State rule applicability for this source has been reviewed as follows:

Waste Processing and Conveying Operations (GR-1, GR-2, HM-1, HM-2, CONVEY, and LOAD)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the units, listed in the table below, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the units, listed in the table below shall not exceed following limitations of pounds per hour. The pound per hour limitation was calculated with the following equation:

Interpolation 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:

\[ E = 4.10 \cdot P^{0.67} \]

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

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

\[ E = 55.0 \cdot P^{0.11} - 40 \]

where \( E \) = rate of emission in pounds per hour; and \( P \) = process weight rate in tons per hour

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>( P ) (ton/hr)</th>
<th>( E ) (lb/hr)</th>
<th>Uncontrolled Potential PM Emissions (lb/hr)</th>
<th>Controlled Potential PM Emissions (lb/hr)</th>
<th>Equation Used</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Processing / GR-1, GR-2, HM-1, and HM-2</td>
<td>40</td>
<td>42.53</td>
<td>65.47</td>
<td>5.24</td>
<td>(b)</td>
</tr>
<tr>
<td>Conveying of Sawdust / CONVEY</td>
<td>40</td>
<td>42.53</td>
<td>40.00</td>
<td>40.00</td>
<td>(b)</td>
</tr>
<tr>
<td>Transfer of Sawdust / LOAD</td>
<td>40</td>
<td>42.53</td>
<td>40.00</td>
<td>40.00</td>
<td>(b)</td>
</tr>
</tbody>
</table>

(a) The cyclone C-1 shall be in operation at all times the grinders (GR-1 and GR-2) and hammermills (HM-1 and HM-2) are in operation, in order to comply with this limit.

(b) Based on the calculations, a control equipment is not needed for conveying and loading operations to comply with this limit.
Natural Gas-Fired Units (Heater #1, and Heater #2)

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
The two (2) natural gas-fired heaters (Heater #1 and Heater #2) are not subject to the particulate limitations of 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because they are not sources of indirect heating.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1.5, the natural gas-fired units do not meet the definition of "manufacturing process", therefore are not subject to the requirement of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Natural Gas-Fired Units (Heater #1, and Heater #2) are not subject to 326 IAC 7-1.1 because they have a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, Natural Gas-Fired Units (Heater #1, and Heater #2) were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the Natural Gas-Fired Units (Heater #1, and Heater #2), because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to the Natural Gas-Fired Units (Heater #1, and Heater #2), since these units are not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this source are as follows:

Two (2) grinders (GR-1 and GR-2) and two (2) hammermills (HM-1 and HM-2) have applicable compliance determination conditions as specified below:

(1) In order to comply with the limits in the permit, the cyclone for particulate control shall be in operation at all times that the grinders (GR-1 and GR-2) and hammermills (HM-1 and HM-2) are in operation.

Testing Requirements:

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>Control Device/ Stack</th>
<th>Timeframe for Initial Testing</th>
<th>Pollutant/ Parameter</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wood Waste Processing</td>
<td>Cyclone C-1/S-1</td>
<td>Not later than 180 days of startup of Line 1</td>
<td>PM10, PM2.5</td>
<td>every 5 years</td>
<td>326 IAC 2-1.1-5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>326 IAC 2-2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>326 IAC 2-7</td>
</tr>
</tbody>
</table>
Summary of Testing Requirements

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>Control Device/Stack</th>
<th>Timeframe for Initial Testing</th>
<th>Pollutant/Parameter</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wood Waste Processing</td>
<td>Cyclone C-1/S-1</td>
<td>Not later than 180 days of startup of Line 2</td>
<td>PM10, PM2.5</td>
<td>every 5 years</td>
<td>326 IAC 2-1.1-5, 326 IAC 2-2, 326 IAC 2-7</td>
</tr>
<tr>
<td>Drywall Processing</td>
<td>Cyclone C-1/S-1</td>
<td>Not later than 180 days of start of drywall processing in Line 1</td>
<td>PM10, PM2.5</td>
<td>every 5 years</td>
<td>326 IAC 2-1.1-5, 326 IAC 2-2, 326 IAC 2-7</td>
</tr>
</tbody>
</table>

(b) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Control Device/Stack</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cyclone (C-1)/S-1</td>
<td>Visible Emission Notations</td>
<td>Daily</td>
<td>Normal or abnormal</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the cyclone C-1 for the grinders (GR-1 and GR-2) and hammermills (HM-1 and HM-2) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Process) and in order to render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 11, 2019.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. 039-41354-00852. The staff recommends to the Commissioner that the New Source Construction and FESOP be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact L. David Cohen, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-9327 or (800) 451-6027, and ask for L. David Cohen or (317) 233-9327.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Source-Wide Potential Emission Summary

**Processing Both Wood Waste and Drywall Waste**

<table>
<thead>
<tr>
<th>Emission Units/IDs</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAP</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receiving Station</td>
<td>0.53</td>
<td>0.193</td>
<td>0.193</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Grinder #1 (GR-1)</td>
<td>117.31</td>
<td>90.59</td>
<td>84.08</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Hammermill #1 (HM-1)</td>
<td>26.06</td>
<td>13.03</td>
<td>6.52</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Grinder #2 (GR-2)</td>
<td>26.06</td>
<td>13.03</td>
<td>6.52</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Hammermill #2 (HM-2)</td>
<td>26.06</td>
<td>13.03</td>
<td>6.52</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Gypsum Drop</td>
<td>0.20</td>
<td>0.10</td>
<td>0.014</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Conveying of Sawdust (CONVEY)</td>
<td>0.89</td>
<td>0.33</td>
<td>0.33</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Loading of Sawdust (LOAD)</td>
<td>0.45</td>
<td>0.16</td>
<td>0.16</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Natural Gas Combustion Unit (COMBUST)</td>
<td>0.02</td>
<td>0.07</td>
<td>0.07</td>
<td>0.01</td>
<td>0.05</td>
<td>0.05</td>
<td>0.72</td>
<td>0.02</td>
<td>Hexane</td>
</tr>
<tr>
<td><strong>Fugitive</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unpaved Roads</td>
<td>20.79</td>
<td>5.54</td>
<td>0.56</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>Total PTE</strong></td>
<td>197.58</td>
<td>130.53</td>
<td>104.39</td>
<td>0.01</td>
<td>0.05</td>
<td>0.05</td>
<td>0.72</td>
<td>0.02</td>
<td>Hexane</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>NA</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
<td>10</td>
</tr>
</tbody>
</table>

**Notes:**

1. Under the Part 70 permit program (Title V), PM-10 and PM-2.5, and not PM, are each considered as a "regulated air pollutant".
2. The total PM-10 and PM-2.5 emissions must be limited to less than 100 tons/yr to avoid triggering the Part 70 (Title V) major source permit program.
3. The total PM, PM-10, and PM-2.5 emissions must be limited to less than 250 tons/yr to avoid triggering PSD (this is the correct threshold since this type of operation is not one of the specific 28 listed 'source categories under 326 IAC 2-2.
4. Fugitive PM emissions are counted towards state permit applicability determination.
5. Since this type of operation is not one of the specific 28 listed source categories and there is no applicable NSPS that was in effect on 8/7/80, fugitive PM emissions are not counted towards the PSD determination.
### Controlled and Limited Potential Emissions (tons/year)

<table>
<thead>
<tr>
<th>Emission Units/IDs</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAP</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Receiving Station</strong></td>
<td>0.329</td>
<td>0.120</td>
<td>0.120</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Stack 1 - Cyclone Exhaust</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grinder #1 (GR-1)</td>
<td>4.50</td>
<td>3.31</td>
<td>2.95</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hammermill #1 (HM-1)</td>
<td>1.46</td>
<td>0.73</td>
<td>0.36</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grinder #2 (GR-2)</td>
<td>1.46</td>
<td>0.73</td>
<td>0.36</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hammermill #2 (HM-2)</td>
<td>1.46</td>
<td>0.73</td>
<td>0.36</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Stack 1 - Cyclone Exhaust - Total</strong></td>
<td>8.87</td>
<td>5.50</td>
<td>4.04</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gypsum - Drop (inside manufacturing building)</td>
<td>0.08</td>
<td>0.04</td>
<td>0.006</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Storage/Loadout Building</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wood - Drop #1</td>
<td>0.31</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wood - Drop #2</td>
<td>0.31</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Loading of Sawdust (LOAD)</td>
<td>0.31</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Storage/Loadout Building - Total</strong></td>
<td>0.34</td>
<td>0.34</td>
<td>0.34</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas Combustion Unit (COMBUST)</td>
<td>0.02</td>
<td>0.07</td>
<td>0.07</td>
<td>0.01</td>
<td>0.86</td>
<td>0.05</td>
<td>0.72</td>
<td>0.02</td>
<td>0.02 Hexane</td>
</tr>
<tr>
<td><strong>Fugitive</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unpaved Roads</td>
<td>10.39</td>
<td>2.77</td>
<td>0.28</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>PTE (Excluding Fugitives)</strong></td>
<td>10.15</td>
<td>6.03</td>
<td>4.57</td>
<td>0.01</td>
<td>0.86</td>
<td>0.05</td>
<td>0.72</td>
<td>0.02</td>
<td>0.02 Hexane</td>
</tr>
</tbody>
</table>

**Notes:**
1. Cyclone will need to be used to keep the facility as a minor source under the state permit rules and to avoid triggering federal Prevention of Significant Deterioration (PSD) applicability.
2. For the cyclone to be able to be utilized to limit potential emissions to meet item #1, the control equipment must be identified specifically in a federally enforceable permit.
Appendix A: Emissions Calculations
PM and PM\textsubscript{10} Emissions from Fugitive Sources
Gypsum Drop into Container

Company Name: Pine Cone Recycling
Source Address: Elkhart, Indiana
Permit Number: 039-41354-00852
Reviewer: Luda Lang

Truck Dumping Stations

\[ E = k(0.0032) \times (U/5)^{1.3} / (M/2)^{1.4} \]

- **Emission Factor (lbs/ton)**:
  - \( k = 0.74 \) particle size multiplier for PM
  - \( 0.35 \) particle size multiplier for PM\textsubscript{10}
  - \( 0.053 \) particle size multiplier for PM\textsubscript{2.5}
  - \( U = 10 \) mean wind speed (mph)
  - \( M = 1.0 \) material moisture content (fraction)

PM Emission Factor:
\[ E = 1.54E-02 \text{ lb/ton} \]

PM\textsubscript{10} Emission Factor:
\[ E = 7.28E-03 \text{ lb/ton} \]

PM\textsubscript{2.5} Emission Factor:
\[ E = 1.10E-03 \text{ lb/ton} \]

<table>
<thead>
<tr>
<th>Emission Factor (lb/ton)</th>
<th>PM</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unlimited Gypsum Drop</td>
<td>6,000</td>
<td>26,280</td>
<td></td>
</tr>
<tr>
<td>Annual limited amount of gypsum =</td>
<td>2,500</td>
<td>10,950</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PTE (Unlimited) tons/yr</th>
<th>PM</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.20</td>
<td>1.54E-02</td>
<td>7.28E-03</td>
<td>1.10E-03</td>
</tr>
<tr>
<td>0.10</td>
<td>0.35</td>
<td>0.10</td>
<td>0.014</td>
</tr>
<tr>
<td>0.014</td>
<td>0.053</td>
<td>0.04</td>
<td>0.0060</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PTE Gypsum Drop (tons/yr)</th>
<th>PM</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.08</td>
<td>1.10E-03</td>
<td>0.04</td>
<td>0.01</td>
</tr>
<tr>
<td>0.04</td>
<td>0.08</td>
<td>0.04</td>
<td>0.01</td>
</tr>
<tr>
<td>0.0060</td>
<td>0.01</td>
<td>0.04</td>
<td>0.01</td>
</tr>
</tbody>
</table>

Total PTE

**Note:**
Emission factors from AP-42, Chapter 13.2.4 Aggregate Handling And Storage Piles
All drywall waste is processed through one grinder only.

**Methodology:**

- PM, PM\textsubscript{10}, PM\textsubscript{2.5} Emission Factors (lbs/ton) = particle size multiplier for PM/PM\textsubscript{10}/PM\textsubscript{2.5} x 0.0032 x (mean wind speed (mph) / 5)^1.3 x (material moisture content (%) / 2)^1.4
### Waste Processing and Conveying Potential Emissions

Processing Both Wood Waste and Drywall Waste

#### Unlimited Waste (Class A/Class B Wood Waste Only) Processing

<table>
<thead>
<tr>
<th>Process</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PM-10 Emission Factor (lb/ton)</th>
<th>PM-2.5 Emission Factor (lb/ton)</th>
<th>Maximum Process Capacity (lb/hr)</th>
<th>Potential PM Emissions (lb/hr)</th>
<th>Potential PM-10 Emissions (lb/hr)</th>
<th>Potential PM-2.5 Emissions (lb/hr)</th>
<th>Potential PM-10 Emissions (ton/yr)</th>
<th>Potential PM-2.5 Emissions (ton/yr)</th>
<th>Control Efficiency (controlled)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinder #1 (GR-1)</td>
<td>0.35</td>
<td>0.175</td>
<td>0.0875</td>
<td>34,000</td>
<td>17.00</td>
<td>5.95</td>
<td>26.06</td>
<td>2.98</td>
<td>13.03</td>
<td>1.49</td>
</tr>
<tr>
<td>Hammermill #1 (HM-1)</td>
<td>0.35</td>
<td>0.175</td>
<td>0.0875</td>
<td>34,000</td>
<td>17.00</td>
<td>5.95</td>
<td>26.06</td>
<td>2.98</td>
<td>13.03</td>
<td>1.49</td>
</tr>
<tr>
<td>Grinder #2 (GR-2)</td>
<td>0.35</td>
<td>0.175</td>
<td>0.0875</td>
<td>34,000</td>
<td>17.00</td>
<td>5.95</td>
<td>26.06</td>
<td>2.98</td>
<td>13.03</td>
<td>1.49</td>
</tr>
<tr>
<td>Hammermill #2 (HM-2)</td>
<td>0.35</td>
<td>0.175</td>
<td>0.0875</td>
<td>34,000</td>
<td>17.00</td>
<td>5.95</td>
<td>26.06</td>
<td>2.98</td>
<td>13.03</td>
<td>1.49</td>
</tr>
</tbody>
</table>

#### Notes

1. The processing building will include two separate Rotochopper EC 366 electric horizontal grinders with hammermills. All wood grinding operations will take place inside the building. The actual grinding of wood waste is 100% enclosed through the horizontal grinders which will produce ground wood similar in size to wood chips. The ground wood is further processed in the 100% sealed hammermills which are under negative air pressure to pull materials through the units.

2. PM, PM-10, and PM-2.5 emissions are estimated using emission factors from USEPA Region 10 for sawing at Sawmills (May 2014).

3. Maximum process capacity for each individual unit is based upon the equipment manufacturer's design rating of 20 tons/hr for each grinder and hammermill (this equates to a total maximum throughput of 960 tons/day), and taking into account that a maximum of 85% of the waste material will be wood waste (Class A or Class B).

4. One high efficiency cyclone will be used for emission control for both grinders and hammermills with a manufacturer specified control efficiency of 92.0%.

Drywall Density = 1.44 lb/ft\(^2\)
## Unlimited Waste (Drywall Waste Only) Processing

<table>
<thead>
<tr>
<th>Process</th>
<th>PM Emission Factor (lb/1000 ft²)</th>
<th>PM-10 Emission Factor (lb/1000 ft²)</th>
<th>PM-2.5 Emission Factor (lb/1000 ft²)</th>
<th>Maximum Process Capacity (lb/hr)</th>
<th>Potential PM Emissions (lb/hr)</th>
<th>Potential PM-10 Emissions (lb/hr)</th>
<th>Potential PM-2.5 Emissions (lb/hr)</th>
<th>Control Efficiency</th>
<th>Potential PM Emissions (ton/yr)</th>
<th>Potential PM-10 Emissions (ton/yr)</th>
<th>Potential PM-2.5 Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinder #1 (GR-1)</td>
<td>5.00</td>
<td>4.25</td>
<td>4.25</td>
<td>0.00</td>
<td>0.00</td>
<td>91.25</td>
<td>17.71</td>
<td>17.71</td>
<td>92.0%</td>
<td>20.83</td>
<td>7.30</td>
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<tr>
<td>Grinder #2 (GR-2)</td>
<td>5.00</td>
<td>4.25</td>
<td>4.25</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>92.0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>EF (lb/ton drywall)</td>
<td>6.94</td>
<td>5.90</td>
<td>5.90</td>
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<tr>
<td>EF (ton drywall controlled)</td>
<td>0.46</td>
<td>0.34</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

### Notes
1. The processing building will include two separate Rotochopper EC 366 electric horizontal grinders with hammermills. For air emission calculation purposes, each piece of equipment is considered an individual air emission unit. All drywall grinding operations will take place inside the building. The actual grinding of drywall waste (creating gypsum) is 100% enclosed through one horizontal grinder. Gypsum by-passes the hammermill process and is captured in containers inside the building.
2. PM emissions from each grinder are estimated using emission factors from FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (August 1995), SCC # 3-05-015-22 (end sawing of wallboard at gypsum manufacturing operation).
3. PM-10 and PM-2.5 emissions from each grinder are estimated using emission factors from FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (August 1995), SCC # 3-05-015-22 (end sawing of wallboard at gypsum manufacturing operation). It is assumed that PM-10 emissions are equal to PM-2.5 emissions.
4. Maximum process capacity for each individual unit is based upon the equipment manufacturer’s design rating of 20 tons/hr for each grinder (this equates to a total maximum throughput of 960 tons/day), and taking into account that a maximum of 15% of the waste material will be drywall waste (containing gypsum). Only 1 grinder will be used to process drywall.
5. One high efficiency cyclone will be used for emission control for both grinders with a manufacturer specified control efficiency of 92.0%.
6. Assume on average, facility receives 1/2” drywall that weighs approximately 1.44 lb/ft².

### Total Limited Throughput
- Total Limited Throughput: 600 tpd Limited by both land permit and a limited condition in the air permit
- Limited Drywall: 25000 lb/hr per line expressly limited by permit
- Balance of 600 tph being wood: 22500 lb/hr per line expressly limited by permit
### Waste Processing and Conveying Potential Emissions

#### Processing Both Wood Waste and Drywall Waste

<table>
<thead>
<tr>
<th>Process</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PM-10 Emission Factor (lb/ton)</th>
<th>PM-2.5 Emission Factor (lb/ton)</th>
<th>Maximum Process Capacity (ton/hr)</th>
<th>Potential PM Emissions (lb/hr)</th>
<th>Potential PM-10 Emissions (lb/hr)</th>
<th>Potential PM-2.5 Emissions (lb/hr)</th>
<th>Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinder #1 (GR-1)</td>
<td>0.35</td>
<td>0.175</td>
<td>0.0875</td>
<td>23.750</td>
<td>11.88</td>
<td>4.16</td>
<td>18.20</td>
<td>2.08</td>
</tr>
<tr>
<td>Hammermill #1 (HM-1)</td>
<td>0.35</td>
<td>0.175</td>
<td>0.0875</td>
<td>23.750</td>
<td>11.88</td>
<td>4.16</td>
<td>18.20</td>
<td>2.08</td>
</tr>
<tr>
<td>Grinder #2 (GR-2)</td>
<td>0.35</td>
<td>0.175</td>
<td>0.0875</td>
<td>23.750</td>
<td>11.88</td>
<td>4.16</td>
<td>18.20</td>
<td>2.08</td>
</tr>
<tr>
<td>Hammermill #2 (HM-2)</td>
<td>0.35</td>
<td>0.175</td>
<td>0.0875</td>
<td>23.750</td>
<td>11.88</td>
<td>4.16</td>
<td>18.20</td>
<td>2.08</td>
</tr>
</tbody>
</table>

#### Notes

1. The processing building will include two separate Rotochopper EC 366 electric horizontal grinders with hammermills. For air emission calculation purposes, each piece of equipment is considered an individual air emission unit. All wood grinding operations will take place inside the building. The actual grinding of wood waste is 100% enclosed through the horizontal grinders which will produce ground wood similar in size to wood chips. The ground wood is further processed in the 100% sealed hammermills which are under negative air pressure to pull materials through the units.

2. PM, PM-10, and PM-2.5 emissions are estimated using emission factors from USEPA Region 10 for sawing at Sawmills (May 2014).

3. Maximum process capacity is based upon the facility’s designed maximum processing volume of 600 tons/day using two grinders/hammermills, and taking into account that a maximum of 96% of the waste material will be wood waste (Class A or Class B).

4. One high efficiency cyclone will be used for emission control for both grinders and hammermills with a manufacturer specified control efficiency of 92.0%.

**Drywall density =** 1.44 lb/square ft
<table>
<thead>
<tr>
<th>Process</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PM-10 Emissions Factor (lb/1000 ft²)</th>
<th>PM-2.5 Emissions Factor (lb/1000 ft²)</th>
<th>Maximum Process Capacity (ton/hr)</th>
<th>Potential PM Emissions (lb/hr)</th>
<th>Potential PM-10 Emissions (lb/hr)</th>
<th>Potential PM-2.5 Emissions (lb/hr)</th>
<th>Control Efficiency (lb/hr)</th>
<th>Potential PM Emissions After Cyclone (lb/hr)</th>
<th>Potential PM-10 Emissions After Cyclone (lb/hr)</th>
<th>Potential PM-2.5 Emissions After Cyclone (lb/hr)</th>
<th>Potential PM Emissions After Cyclone (ton/yr)</th>
<th>Potential PM-10 Emissions After Cyclone (ton/yr)</th>
<th>Potential PM-2.5 Emissions After Cyclone (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>GR-1</td>
<td>4.25</td>
<td>2.00</td>
<td>2.50</td>
<td>1.25</td>
<td>8.68</td>
<td>38.00</td>
<td>7.38</td>
<td>32.32</td>
<td>30.0%</td>
<td>0.69</td>
<td>3.04</td>
<td>0.59</td>
<td>0.59</td>
<td>5.99</td>
</tr>
<tr>
<td>GR-2</td>
<td>4.25</td>
<td>2.00</td>
<td>2.50</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Notes
1. For air emission calculation purposes, each piece of equipment is considered an individual air emission unit. All drywall grinding operations will take place inside the building. The actual grinding of drywall waste (creating gypsum) is 100% enclosed through one horizontal grinder. Gypsum by-passes the hammermill process and is captured in containers inside the building.
2. PM emissions from one grinder is estimated using emission factors from FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (August 1995), SCC # 3-05-015-22 (end sawing of wallboard at gypsum manufacturing operation).
3. PM-10 and PM-2.5 emissions from each grinder are estimated using emission factors from FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (August 1995), SCC # 3-05-015-22 (end sawing of wallboard at gypsum manufacturing operation).
4. Maximum process capacity for each individual unit is based upon the facility's designed maximum processing volume of 600 tons/day using two grinders, and taking into account that a maximum of 5% of the waste material will be drywall waste. Only 1 grinder will be used to process drywall, so all of the throughput is assigned to GR-1.
5. One cyclone will be used for emission control for both grinders with a manufacturer specified control efficiency of 92.0%.
6. Assume on average, facility receives 1/2" drywall that weighs approximately 1.44 lb/ft².

Methodology
Uncontrolled Potential PM Emissions (lb/hr) = Maximum Process Capacity (ton/hr) x PM Emission Factor (lb/ton) x (1 ft²/1.44 lb) x (2,000 lb/ton)
Uncontrolled Potential PM Emissions (ton/yr) = Uncontrolled Potential PM Emissions (lb/hr) x (8,760 hr/yr) x (2,000 lb/ton)
Uncontrolled Potential PM-10/PM-2.5 Emissions (lb/hr) = Uncontrolled Potential PM-10/PM-2.5 Emissions Factor (lb/1000 ft²) x (1 ft²/1.44 lb) x (2,000 lb/ton)
Uncontrolled Potential PM-10/PM-2.5 Emissions (ton/yr) = Uncontrolled Potential PM-10/PM-2.5 Emissions (lb/hr) x (8,760 hr/yr) x (2,000 lb/ton)
Controlled Potential PM Emissions After Cyclone (lb/hr) = Uncontrolled Potential PM Emissions (lb/hr) x (100% - Control Efficiency %)
Controlled Potential PM Emissions After Cyclone (ton/yr) = Controlled Potential PM Emissions (lb/hr) x (8,760 hr/yr) x (2,000 lb/ton)
Controlled Potential PM-10/PM-2.5 Emissions After Cyclone (lb/hr) = Uncontrolled Potential PM-10/PM-2.5 Emissions (lb/hr) x (100% - Control Efficiency %)
Controlled Potential PM-10/PM-2.5 Emissions After Cyclone (ton/yr) = Controlled Potential PM-10/PM-2.5 Emissions After Cyclone (lb/hr) x (8,760 hr/yr) x (2,000 lb/ton)
## Unlimited Ground Wood Conveying

| Process | PM Emission Factor (lb/ton) | PM-10 Emission Factor (lb/ton) | PM-2.5 Emission Factor (lb/ton) | Maximum Process Capacity (lb/hr) | Potential PM Emissions (lb/hr) | Potential PM-10 Emissions (lb/hr) | Potential PM-2.5 Emissions (lb/hr) | Potential PM Emissions (ton/yr) | Potential PM-10 Emissions (ton/yr) | Potential PM-2.5 Emissions (ton/yr) | Control Efficiency |
|---------|-----------------------------|--------------------------------|----------------------------------|---------------------------------|------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-----------------|-----------------|
| Drop of Dry Material from Incline Conveyor to Belted Conveyor System (Drop #1 for CONVEY) | 0.0030 | 0.0011 | 0.0011 | 68,000 | 34.00 | 0.10 | 0.45 | 0.0374 | 0.16 | 0.0373 | 0.1638 | 0% | 0.10 | 0.45 | 0.04 | 0.16 | 0.0373 | 0.1638 |
| Drop of Dry Material from Belted Conveyor System by Plow System to Indoor Pile (Drop #2 for CONVEY) | 0.0030 | 0.0011 | 0.0011 | 68,000 | 34.00 | 0.10 | 0.45 | 0.0374 | 0.16 | 0.0373 | 0.1638 | 0% | 0.10 | 0.45 | 0.04 | 0.16 | 0.0373 | 0.1638 |

Total: 0.20 | 0.89 | 0.07 | 0.33 | 0.07 | 0.33 | 0.20 | 0.89 | 0.07 | 0.33 | 0.07 | 0.33 |

### Notes
1. Ground wood material will be transferred from the hammermills to a storage pile in the separate storage areas. The hammermills have negative air pressure to pull wood waste material through the unit. After the wood material goes through the hammermill, it will be extracted by air supplied by the dust collection system up into a neutral air exhaust plenum (product separator). The material will fall down into a sealed screw auger that pushes the material onto an inclined rubber belt conveyor. The incline conveyor transports the material from ground level up approximately 40' high into the separate storage areas where it is dropped onto a belted conveyor system to separate the material (Drop #1). The material is then diverted off the conveyor by a plow system that gives the facility the capability to spread the material out over 360 degrees to meet air permitting requirements (Drop #2). The transfer of material after the inlet to the grinders through the hammermills is totally enclosed and therefore not a source of emissions.

2. PM, PM-10, and PM-2.5 emissions are estimated using emission factors from AP-42 Chapter 11.19.2, Table 11.19.2-2 (8/04). There is no emission factor for PM-2.5, so assumes is equal to PM-10.

3. Maximum process capacity is based upon the equipment manufacturer’s design rating of 20 tons/hr for each hammermill (this equates to a total maximum throughput of 960 tons/day), and taking into account that a maximum of 85% of the waste material being conveyed will be wood waste (Class A or Class B).

### Methodology

- Uncontrolled Potential PM Emissions (lb/hr) = Maximum Process Capacity (ton/hr) x PM Emission Factor (lb/ton)
- Uncontrolled Potential PM Emissions (lb/hr) = Uncontrolled Potential PM Emissions (lb/hr) x (6,780 lb/ton) x (2,000 lb/ton)
- Uncontrolled Potential PM-10/PM-2.5 Emissions (lb/hr) = Uncontrolled Potential PM-10/PM-2.5 Emissions (lb/hr) x (6,780 lb/ton) x (2,000 lb/ton)
Limited Ground Wood Conveying

<table>
<thead>
<tr>
<th>Process ¹</th>
<th>PM Emission Factor (lb/ton) ²</th>
<th>PM-10 Emission Factor (lb/ton) ²</th>
<th>PM-2.5 Emission Factor (lb/ton) ²</th>
<th>Maximum Process Capacity (ton/hr)</th>
<th>Potential PM Emissions (lb/hr)</th>
<th>Potential PM-10 Emissions (lb/hr)</th>
<th>Potential PM-2.5 Emissions (lb/hr)</th>
<th>Potential PM-10 Emissions (ton/yr)</th>
<th>Potential PM-2.5 Emissions (ton/yr)</th>
<th>Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drop of Dry Material from Incline Conveyor to Belted Conveyor System (Drop #1 for CONVEY)</td>
<td>0.0030</td>
<td>0.0011</td>
<td>0.0011</td>
<td>47.500</td>
<td>23.75</td>
<td>0.07</td>
<td>0.31</td>
<td>0.03</td>
<td>0.11</td>
<td>0.026</td>
</tr>
<tr>
<td>Drop of Dry Material from Belted Conveyor System by Plow System to Indoor Pile (Drop #2 for CONVEY)</td>
<td>0.0030</td>
<td>0.0011</td>
<td>0.0011</td>
<td>47.500</td>
<td>23.75</td>
<td>0.07</td>
<td>0.31</td>
<td>0.03</td>
<td>0.11</td>
<td>0.026</td>
</tr>
<tr>
<td><strong>Totals:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.14</td>
<td>0.62</td>
<td>0.05</td>
<td>0.23</td>
<td>0.05</td>
</tr>
</tbody>
</table>

Notes

1. Ground wood material will be transferred from the hammermills to a storage pile in the separate storage areas. The hammermills have negative air pressure to pull wood waste material through the unit. After the wood material goes through the hammermill, it will be extracted by air supplied by the dust collection system up into a neutral air exhaust plenum (product separator). The material will fall down into a sealed screw auger that pushes the material onto an inclined rubber belt conveyor. The incline conveyor transports the material from ground level up approximately 40’ high into the separate storage areas where it is dropped onto a belted conveyor system to disperse the material (Drop #1). The material is then diverted off the conveyor by a plow system that gives the facility the capability to spread the material out over 360 degrees to meet air permitting requirements (Drop #2). The transfer of material after the inlet to the grinders through the hammermills is totally enclosed and therefore not a source of emissions.

2. PM, PM-10, and PM-2.5 emissions are estimated using emission factors from AP-42 Chapter 11.19.2, Table 11.19.2-2 (8/04). There is no emission factor for PM-2.5, so assumes is equal to PM-10.

3. Maximum process capacity is based upon the facility’s designed maximum processing volume of 600 tons/day using two hammermills, and taking into account that a maximum of 95% of the waste material will be wood waste (Class A or Class B). The solid waste processing facility permit to be issued by IDEM will include a design limit of 600 tons/day, which is equivalent to 25 tons/hr total throughput of all waste materials combined.

Methodology

Uncontrolled Potential PM Emissions (lb/hr) = Maximum Process Capacity (ton/hr) x PM Emission Factor (lb/ton)

Uncontrolled Potential PM-10/PM-2.5 Emissions (lb/hr) = Uncontrolled Potential PM Emissions (lb/hr) x (8,760 hr/yr) x (2,000 lb/ton)

Uncontrolled Potential PM-10/PM-2.5 Emissions (ton/yr) = Uncontrolled Potential PM-10/PM-2.5 Emissions (lb/hr) x (8,760 hr/yr) x (2,000 lb/ton)
### Unlimited Truck Loading

<table>
<thead>
<tr>
<th></th>
<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Drop of Dry Material Which Includes Loadout From Storage Piles Into a Truck/Trailer by Front-End Loader (LOAD)</td>
<td>0.0030</td>
<td>0.0011</td>
<td>0.0011</td>
<td>68,000</td>
<td>34.00</td>
<td>0.10</td>
<td>0.45</td>
<td>0.04</td>
<td>0.16</td>
<td>0.037</td>
<td>0.16</td>
<td>0%</td>
<td>0.10</td>
<td>0.45</td>
<td>0.04</td>
<td>0.16</td>
<td>0.037</td>
<td>0.16</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Notes**
1. Ground wood will be loaded onto trucks/trailers using a front-end loader. There will be no mandated dust collection/controls on the loading process to meet air permitting requirements. Since the transfer of material will be performed within the building, the PM emissions are considered non-fugitive.
2. PM, PM-10, and PM-2.5 emissions are estimated using emission factors from AP-42 Chapter 11.19.2, Table 11.19.2-2 (8/04). There is no emission factor for PM-2.5, so assumes is equal to PM-10.
3. Maximum process capacity is based upon the equipment manufacturer’s design rating of 20 tons/hr for each hammermill (this equates to a total maximum throughput of 960 tons/day), and taking into account that a maximum of 85% of the waste material being loaded will be wood waste (Class A or Class B).

**Methodology**

Uncontrolled Potential PM Emissions (lb/hr) = Maximum Process Capacity (ton/hr) x PM Emission Factor (lb/ton)

Uncontrolled Potential PM-10/PM-2.5 Emissions (lb/hr) = Maximum Process Capacity (ton/hr) x PM-10/PM-2.5 Emission Factor (lb/ton)

Uncontrolled Potential PM Emissions (ton/yr) = Uncontrolled Potential PM Emissions (lb/hr) x (8,760 hr/yr) x (2,000 lb/ton)

Uncontrolled Potential PM-10/PM-2.5 Emissions (ton/yr) = Uncontrolled Potential PM-10/PM-2.5 Emissions (lb/hr) x (8,760 hr/yr) x (2,000 lb/ton)
### Limited Truck Loading

<table>
<thead>
<tr>
<th>Process 1</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PM-10 Emission Factor (lb/ton)</th>
<th>PM-2.5 Emission Factor (lb/ton)</th>
<th>Maximum Process Capacity (ton/hr)</th>
<th>Potential PM Emissions (lb/hr)</th>
<th>Potential PM-10 Emissions (lb/hr)</th>
<th>Potential PM-2.5 Emissions (lb/hr)</th>
<th>Control Efficiency</th>
<th>Potential PM Emissions (ton/yr)</th>
<th>Potential PM-10 Emissions (ton/yr)</th>
<th>Potential PM-2.5 Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drop of Dry Material Which Includes Loadout From Storage Piles Into a Truck/Trailer by Front-End Loader (LOAD)</td>
<td>0.0030</td>
<td>0.0011</td>
<td>0.0011</td>
<td>47.500</td>
<td>23.75</td>
<td>0.07</td>
<td>0.31</td>
<td>0.03</td>
<td>0.11</td>
<td>0.026</td>
<td>0.11</td>
</tr>
</tbody>
</table>

**Notes**

1. Ground wood will be loaded onto trucks/trailers using a front-end loader. There will be no mandated dust collection/controls on the loading process to meet air permitting requirements. Since the transfer of material will be performed within the building, the PM emissions are considered non-fugitive.

2. PM, PM-10, and PM-2.5 emissions are estimated using emission factors from AP-42 Chapter 11.19.2, Table 11.19.2-2 (8/04). There is no emission factor for PM-2.5, so assumes is equal to PM-10.

3. Maximum process capacity is based upon the facility’s designed maximum processing volume of 600 tons/day using two hammermills, and taking into account that a maximum of 95% of the waste material will be wood waste (Class A or Class B). The solid waste processing facility permit to be issued by IDEM will include a design limit of 600 tons/day, which is equivalent to 25 tons/hr total throughput of all waste materials combined.
Facility-Wide Emission Totals:

<table>
<thead>
<tr>
<th>Description</th>
<th>Total Uncontrolled Unlimited Potential PM Emissions (ton/yr)</th>
<th>Total Controlled Unlimited Potential PM Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unlimited</td>
<td>16.98</td>
<td>10.87</td>
</tr>
<tr>
<td>Limited</td>
<td>9.80</td>
<td>5.64</td>
</tr>
</tbody>
</table>

326 IAC 6-3-2 State Allowable PM Emission Rate:

<table>
<thead>
<tr>
<th>Process</th>
<th>Process Weight Rate (lb/hr)</th>
<th>Process Weight Rate (ton/hr)</th>
<th>State Allowable PM Emission Rate (lb/hr)</th>
<th>Uncontrolled Potential PM Emissions (lb/hr)</th>
<th>Controlled Potential PM Emissions (lb/hr)</th>
<th>Control Device Needed to Comply?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line #1 (Grinder #1 and Hammermill #1)</td>
<td>74,000</td>
<td>37.0</td>
<td>41.82</td>
<td>11.90</td>
<td>0.95</td>
<td>N</td>
</tr>
<tr>
<td>Line #2 (Grinder #2 and Hammermill #2)</td>
<td>74,000</td>
<td>37.0</td>
<td>41.82</td>
<td>0.20</td>
<td>0.20</td>
<td>N</td>
</tr>
<tr>
<td>CONVEY</td>
<td>68,000</td>
<td>34.0</td>
<td>41.06</td>
<td>0.10</td>
<td>0.10</td>
<td>N</td>
</tr>
<tr>
<td>LOAD</td>
<td>68,000</td>
<td>34.0</td>
<td>41.06</td>
<td>0.10</td>
<td>0.10</td>
<td>N</td>
</tr>
</tbody>
</table>

Notes:
- Process Weight Rate is the total maximum capacity of the woodworking operation in lb/hr as provided by the facility (convert panel ft² to lbs).
- State Allowable PM Emission Rate is based upon the maximum process throughput capacity and is determined by the equation in 326 IAC 6-3-2. All processes are in compliance with State Allowable PM Emission Rate without add-on controls since the worst-case maximum uncontrolled potential PM emissions (lb/hr) are less than the state allowable PM emissions (lb/hr).

Methodology:
- State Allowable PM Emission Rate (lb/hr) = 55.0 x (Process Weight Rate (ton/hr))²/³ - 40
- This equation is valid for process weight rates that exceed 60,000 lb/hr.
### Unlimited Truck Unloading (onto tipping floor inside building)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Drop of Material onto Processing Building Floor</td>
<td>0.0030</td>
<td>0.0011</td>
<td>0.0011</td>
<td>80,000</td>
<td>40.00</td>
<td>0.12</td>
<td>0.526</td>
<td>0.044</td>
<td>0.19</td>
<td>0.044</td>
</tr>
</tbody>
</table>

### Methodology

Uncontrolled Potential PM Emissions (lb/hr) = Maximum Process Capacity (ton/hr) x PM Emission Factor (lb/ton)

Uncontrolled Potential PM Emissions (ton/yr) = Uncontrolled Potential PM Emissions (lb/hr) x (8,760 hr/yr) x (2,000 lb/ton)

PM, PM-10, and PM-2.5 emissions are estimated using emission factors from AP-42 Chapter 11.19.2, Table 11.19.2-2 (8/04). Assume PM-10 = PM-2.5.

### Limited Truck Unloading (onto tipping floor inside building)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Drop of Material onto Processing Building Floor</td>
<td>0.0030</td>
<td>0.0011</td>
<td>0.0011</td>
<td>50,000</td>
<td>25.00</td>
<td>0.08</td>
<td>0.329</td>
<td>0.028</td>
<td>0.12</td>
<td>0.028</td>
</tr>
</tbody>
</table>

### Notes

Maximum process capacity is based upon the equipment manufacturer's design rating of 20 tons/hr for each line (this equates to a total maximum throughput of 960 tons/day).

Facility permit to be issued by IDEM will include a design limit of 600 tons/day, which is equivalent to 25 tons/hr total throughput of all waste materials combined. Assume this amount of waste is received at the site to match production demand.

PM, PM-10, and PM-2.5 emissions based on AP-42 Table 11.19.2-2
### Pollutant Emissions

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.02</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.07</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.07</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.01</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>0.86</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.05</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>0.72</td>
</tr>
</tbody>
</table>

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32**

### Methodology

All emission factors are based on normal firing.

- MMBtu = 1,000,000 Btu
- MMCF = 1,000,000 Cubic Feet of Gas
- Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
- Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
- Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th></th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.8E-05</td>
<td>1.0E-05</td>
<td>6.4E-04</td>
<td>0.02</td>
<td>2.9E-05</td>
<td>0.02</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th></th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>4.3E-06</td>
<td>9.4E-06</td>
<td>1.2E-05</td>
<td>3.3E-06</td>
<td>1.8E-05</td>
<td>4.7E-05</td>
</tr>
</tbody>
</table>

**Methodology is the same as above.**
The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/trip)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicles (entering plant) (one-way trip)</td>
<td>120.0</td>
<td>1.0</td>
<td>120.0</td>
<td>5.0</td>
<td>600.0</td>
<td>30.0</td>
<td>900.0</td>
<td>1,080</td>
</tr>
<tr>
<td>Vehicles (leaving plant) (one-way trip)</td>
<td>60.0</td>
<td>1.0</td>
<td>60.0</td>
<td>5.0</td>
<td>360.0</td>
<td>30.0</td>
<td>900.0</td>
<td>1,080</td>
</tr>
</tbody>
</table>

**Totals**

180.0

960.0

44.3

16,176.1

Average Vehicle Weight Per Trip = 5.3 tons/trip
Average Miles Per Trip = 0.25 miles/trip

Unmitigated Emission Factor, \( Ef \) = \( k \times \left( \frac{s}{12} \right)^a \times \left( \frac{W}{3} \right)^b \) (Equation 1a from AP-42 13.2.2)

- \( k = 4.9 \times 10^{-3} \text{ lb/mile} \) (AP-42 Table 13.2.2-2 for Industrial Roads)
- \( s = 6.0 \% \) (mean % silt content of unpaved roads AP-42 Table 13.2.2-1 Iron and Steel Production)
- \( a = 0.7 \) (constant AP-42 Table 13.2.2-2 for Industrial Roads)
- \( W = 5.3 \text{ tons} \) (average vehicle weight provided by source)
- \( b = 0.45 \) (constant AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( E_{ext} \) = \( E \times \left( \frac{365 - P}{365} \right) \) (Equation 2 from AP-42 13.2.2)

- \( P = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

Mitigated Emission Factor, \( E_{ext} \) = \( E \times \left( \frac{365 - P}{365} \right) \) (in units of lb/mile)

- \( E_{PM} = 3.91 \text{ lb/mile} \)
- \( E_{PM10} = 0.68 \text{ lb/mile} \)
- \( E_{PM2.5} = 0.07 \text{ lb/mile} \)

Dust Control Efficiency = 50% (pursuant to dust suppression measures outlined in solid waste processing facility permit application)

### Process

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (After Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicles (entering plant) (one-way trip)</td>
<td>13.85</td>
<td>3.69</td>
<td>0.37</td>
<td>6.93</td>
<td>1.85</td>
<td>0.18</td>
</tr>
<tr>
<td>Vehicles (leaving plant) (one-way trip)</td>
<td>6.93</td>
<td>1.85</td>
<td>0.18</td>
<td>3.46</td>
<td>0.92</td>
<td>0.09</td>
</tr>
</tbody>
</table>

**Totals**

20.78

5.54

0.55

10.39

2.77

0.28

### Methodology:

- Total Weight driven per day (ton/day) = \( \text{Maximum Weight Loaded (tons/trip)} \times \text{Maximum trips per day (trip/day)} \)
- Maximum one-way distance (mi/trip) = \( \text{Maximum one-way distance (feet/trip)} / [5280 \text{ ft/mile}] \)
- Maximum one-way miles (miles/day) = \( \text{SUM(Weight driven per day (ton/day)) / SUM(Maximum trips per day (trip/day))} \)
- Average Miles Per Trip (miles/trip) = \( \text{SUM(Maximum one-way miles (miles/day)) / SUM(Maximum trips per year (trip/day))} \)
- Mitigated PTE (Before Control) (tons/yr) = \( \text{(Maximum one-way miles (miles/yr))} \times \text{(Mitigated Emission Factor (lb/mile))} \times \text{(ton/2000 lbs)} \)
- Mitigated PTE (After Control) (tons/yr) = \( \text{(Mitigated PTE (Before Control) (tons/yr)} \times \text{(1 - Dust Control Efficiency)} \)

### Abbreviations:

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

### Note:

The source is not subject to 326 IAC 6-5 because the potential fugitive PM emissions are less than 25 tons/yr. Therefore, no fugitive dust control plan is required.

The source is subject to 326 IAC 6-4 because vehicle traffic on unpaved roads does have the potential to emit fugitive PM emissions. The source will not allow fugitive dust to escape beyond the property lines.
Air Quality Analysis

PM Impacts for Pine Cone Recycling
Elkhart, Indiana (Elkhart County)

Proposed Source

Pine Cone Recycling, (Pine Cone), a recycler of wood and drywall waste is requesting a minor source construction permit to locate in Elkhart County. Public comments have expressed concern about the source’s potential impacts for PM$_{2.5}$ and PM$_{10}$ on air quality in the area. The Office of Air Quality has conducted an air quality analysis to assess the modeled air quality impacts from the proposed source and compare to the PM$_{10}$ and PM$_{2.5}$ National Ambient Air Quality Standards (NAAQS).

Air Quality Impact Objectives

The purpose of the air quality impact analysis is to accomplish the following objectives. Each objective is individually addressed in this document in each section outlined below.

A. Provide analyses of actual stack heights with respect to Good Engineering Practice (GEP), the meteorological data used, a description of the model used in the analysis, and the receptor grid utilized for the analyses.

B. Establish that the proposed permit will not cause a violation of PM$_{10}$ standards.

C. Establish that the proposed permit will not cause a violation of PM$_{2.5}$ standards.

Section A – Good Engineering Practice (GEP), Met Data, Model Used, Receptor Grid and Terrain

Stack Height Compliance with Good Engineering Practice (GEP)

Stacks should comply with GEP requirements established in 326 IAC 1-7-4. If stacks are lower than GEP, excessive ambient concentrations due to aerodynamic downwash may occur. Dispersion modeling credit for stacks taller than 65 meters (213 feet) is limited to GEP for the purpose of establishing emission limitations. The GEP stack height takes into account the distance and dimensions of nearby structures, which affects the downwind wake of the stack. The downwind wake is considered to extend five times the lesser of the structure's height or width. A GEP stack height is determined for each nearby structure by the following formula:

\[ H_g = H + 1.5L \]

Where:
- \( H_g \) is the GEP stack height
- \( H \) is the structure height
- \( L \) is the structure's lesser dimension (height or width)
Meteorological Data

The National Weather Service (NWS) 1-minute Automated Surface Observation Station (ASOS) meteorological data used in the air quality analysis consisted of 2014 through 2018 surface data from South Bend, Indiana and upper air measurements taken at Wilmington, Ohio. The meteorological data was preprocessed using the version 18081 of AERMET.

Model Description

The Office of Air Quality (OAQ) used AERMOD version 18081 in the air quality analysis review to determine maximum off-property concentrations or impacts for each pollutant. All regulatory default options were utilized in the U.S. EPA approved model, as listed in the 40 Code of Federal Regulations Part 51, Appendix W “Guideline on Air Quality Models”.

Receptor Grid

OAQ modeling used a receptor grid with the following characteristics:

- Receptors every 100 meters spaced out to a 4000 meter square surrounding Pine Cone
- Receptors every 50 meters along the proposed fence line

Treatment of Terrain

Receptor terrain elevation inputs were interpolated from NED (National Elevation Dataset) data obtained from the USGS. NED terrain data was preprocessed using AERMAP.

Section B - Maintenance of the PM$_{10}$ standard

Modeling for the PM$_{10}$ and PM$_{2.5}$ standards were performed in the same manner. The proposed PM$_{10}$ and PM$_{2.5}$ emission limits for Pine Cone were modeled and are shown in Table 1. Emissions of the nearby Elkhart County Solid Waste landfill were modeled also. For the 24-hour PM$_{10}$ standard, the highest second-high modeled concentration using the proposed emission rates over 5 years was determined. The average of the 8th highest 24-hour PM$_{2.5}$ emission impact, using an average of 5 years of modeled data was compared to the 24-hour PM$_{2.5}$ standard while the annual PM$_{2.5}$ highest modeled impacts over the 5 modeled years was compared to the annual PM$_{2.5}$ standard. Modeling results for PM$_{10}$ and PM$_{2.5}$ runs are shown in Tables 2 and 3.
The availability of PM\textsubscript{10} monitoring data in the area is sparse so data was taken from the Portage PM\textsubscript{10} monitor (ID# 181270023), in a very industrialized location in Porter County. Monitoring readings taken from this monitor were extremely conservative; therefore excluded wind directions which originated from areas occupied by steel mills. The PM\textsubscript{10} concentrations from the remaining wind direction sectors are considered representative of the area surrounding Pine Cone and were incorporated within the PM\textsubscript{10} modeling runs. The PM\textsubscript{10} modeling results are shown in Table 2.

<table>
<thead>
<tr>
<th>SOURCE</th>
<th>PM\textsubscript{10} EMISSION RATE (tons/year)</th>
<th>PM\textsubscript{2.5} EMISSION RATE (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>S1 Stack</td>
<td>5.50</td>
<td>4.04</td>
</tr>
<tr>
<td>Combustion</td>
<td>0.07</td>
<td>0.07</td>
</tr>
<tr>
<td>Loading</td>
<td>0.34</td>
<td>0.34</td>
</tr>
<tr>
<td>Unpaved Roads</td>
<td>2.77</td>
<td>0.28</td>
</tr>
<tr>
<td>Receiving</td>
<td>0.12</td>
<td>0.12</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>8.80</strong></td>
<td><strong>4.85</strong></td>
</tr>
</tbody>
</table>

The availability of PM\textsubscript{10} monitoring data in the area is sparse so data was taken from the Portage PM\textsubscript{10} monitor (ID# 181270023), in a very industrialized location in Porter County. Monitoring readings taken from this monitor were extremely conservative; therefore excluded wind directions which originated from areas occupied by steel mills. The PM\textsubscript{10} concentrations from the remaining wind direction sectors are considered representative of the area surrounding Pine Cone and were incorporated within the PM\textsubscript{10} modeling runs. The PM\textsubscript{10} modeling results are shown in Table 2.

**TABLE 2**

**PM\textsubscript{10} Modeling Results**

<table>
<thead>
<tr>
<th>Averaging Period</th>
<th>Total PM\textsubscript{10} Modeled Impacts with Background (µg/m\textsuperscript{3})</th>
<th>PM\textsubscript{10} National Ambient Air Quality Standard (µg/m\textsuperscript{3})</th>
<th>Less than NAAQS Standard?</th>
</tr>
</thead>
<tbody>
<tr>
<td>24-Hour\textsuperscript{1}</td>
<td>90.2</td>
<td>150</td>
<td>Yes</td>
</tr>
</tbody>
</table>

\textsuperscript{1} Highest second-highest of 5 years modeled

**Section C - Maintenance of the PM\textsubscript{2.5} standard**

Modeling results for the 24-hour and annual PM\textsubscript{2.5} standards, using Pine Cone’s proposed emission rates, were added to monitoring readings taken from the Prairie Street PM\textsubscript{2.5} monitor (ID# 180390008) in Elkhart County. Results for these runs are given in Table 3.
TABLE 3
PM$_{2.5}$ Modeling Results

<table>
<thead>
<tr>
<th>Averaging Period</th>
<th>PM$_{2.5}$ Background (µg/m$^3$)</th>
<th>Proposed PM$_{2.5}$ Modeled Impacts (µg/m$^3$)</th>
<th>Total PM$_{2.5}$ Modeled Impacts (µg/m$^3$)</th>
<th>PM$_{2.5}$ National Ambient Air Quality Standard (µg/m$^3$)</th>
<th>Less than PM$_{2.5}$ NAAQS Standard?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual$^1$</td>
<td>8.3</td>
<td>2.4</td>
<td>10.7</td>
<td>12.0</td>
<td>Yes</td>
</tr>
<tr>
<td>24-Hour$^2$</td>
<td>22.0</td>
<td>9.6</td>
<td>31.6</td>
<td>35.0</td>
<td>Yes</td>
</tr>
</tbody>
</table>

$^1$ Highest of 5 years modeled  
$^2$ Average of 8th-highest over 5 years

Section D – Summary of Results

Pine Cone Recycling is a wood and drywall waste recycler requesting a minor source construction permit to locate in Elkhart County. Modeling results from 24-hour and annual PM$_{2.5}$ and the 24-hour PM$_{10}$ have concluded that the proposed emissions of Pine Cone Recycling will not cause or contribute to any exceedances of the PM$_{2.5}$ and PM$_{10}$ air quality standards.
August 19, 2019

Kenneth Himes
Pine Cone Recycling, LLC
707 N Wildwood Ave
Elkhart, IN 46515

Re: Public Notice
Pine Cone Recycling, LLC
Permit Level: FESOP New Srce Const Minor PSD
Permit Number: 039-41354-00852

Dear Mr. Himes:

Enclosed is a copy of your draft FESOP New Source Construction Minor PSD, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Elkhart Public Library, 300 South 2nd Street in Elkhart, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to L. David Cohen, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0178 or dial (317) 233-0178.

Sincerely,

Theresa Weaver
Theresa Weaver
Permits Branch
Office of Air Quality
August 19, 2019

To: Elkhart Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Pine Cone Recycling, LLC
Permit Number: 039-41354-00852

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

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

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

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

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

Enclosures
PN Library updated 4/2019
August 19, 2019
Pine Cone Recycling, LLC
039-41354-00852

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

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

August 19, 2019

A 30-day public comment period has been initiated for:

Permit Number:  039-41354-00852
Applicant Name:  Pine Cone Recycling, LLC
Location:  Elkhart, Elkhart County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN  46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.
Mail Code 61-53

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FACSIMILIE OF PS Form 3877
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**Total number of pieces Listed by Sender**: Total number of Pieces Received at Post Office

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Total number of pieces Listed by Sender: 15
Total number of Pieces Received at Post Office: 15
Postmaster, Per (Name of Receiving employee): Affix stamp here if used as certificate of mailing only

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**Mail Code 61-53**

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Postmaster, Per (Name of Receiving employee): Indiana Department of Environmental Management Office of Air Quality – Permits Branch

100 N. Senate

Indianapolis, IN 46204

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**Mail Code 61-53**

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Mail Code 61-53

Name and address of Sender | Type of Mail: CERTIFICATE OF MAILING ONLY
---|---
Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING

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