INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

**Mike Braun**
*Governor*

**Clint Woods**
*Commissioner*

# NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and Minor Source Operating Permit (MSOP)

for CW Recycling in Marion County

MSOP No.: M097-50167-00973

The Indiana Department of Environmental Management (IDEM) has received an application from CW Recycling, located at 2105 Enterprise Park Place, Indianapolis, IN 46218, for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow CW Recycling to construct and operate a new cardboard, wood, metal, and vinyl siding recycling operation.

The applicant intends to construct and operate new equipment that will emit air pollutants. 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.

IDEM is aware that the material handling operations, sorting operations, storage areas, wood grinder, nonferrous metal processing including a granulator, roof top heater, and diesel tanks have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Indianapolis Public Library - Martindale-Brightwood Branch
2434 N Sherman Dr.
Indianapolis, IN 46218

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

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC) located at https://www.in.gov/idem/legal/public-records/virtual-file-cabinet/. Once you have accessed VFC, you will then have the option to search for source related documents using a variety of criteria. To find documents related to this air permit, click on "Advanced Search", specify "OAQ" in the Program search field, specify the five-digit permit number "50167" in the Permit # search field, then click the Search button at the top or bottom of the webpage.

**How can you participate in this process?**

This notice is posted on IDEM's website (https://www.in.gov/idem/public-notices/). The date that this notice is posted on IDEM's website 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 by sending a written request to IDEM at the address below. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If IDEM decides to conduct a public hearing and/or public meeting, IDEM will post a separate announcement of the date, time, and location of that public hearing and/or public meeting on IDEM's website (https://www.in.gov/idem/public-

notices/). At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M097-50167-00973 in all correspondence.

**Comments should be sent to:**

Sarah Germann
IDEM, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Sarah Germann or (317) 234-6555
Or dial directly: (317) 234-6555
Fax: (317) 232-6749 attn: Sarah Germann
E-mail: SRGerman@idem.IN.gov

In order to notify you of our final decision regarding this permitting action, your U.S. mailing address must be submitted with all comments.

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: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens' Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.

**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 addresses indicated above and will also be sent to the local library indicated above.

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

Natalie Laures

Natalie Laures, Section Chief
Permits Branch
Office of Air Quality

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**Mike Braun**
*Governor*

**Clint Woods**
*Commissioner*

DRAFT

# New Source Construction and Minor Source Operating Permit
# OFFICE OF AIR QUALITY

## CW Recycling
## 2105 Enterprise Park Place
## Indianapolis, Indiana 46218

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

| Operation Permit No.: M097-50167-00973<br>Master Agency Interest ID: 136538 | |
|---|---|
| Issued by:<br><br>Natalie Laures, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date:<br><br>Expiration Date: |

Visit on.IN.gov/survey or scan the QR code to provide feedback.
*We appreciate your input!*

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary cardboard, wood, metal, and vinyl siding recycling operation.

| | |
|---|---|
| Source Address: | 2105 Enterprise Park Place, Indianapolis, Indiana 46218 |
| General Source Phone Number: | (317) 245-6400 |
| SIC Code: | 5093 (Scrap and Waste Materials) |
| County Location: | Marion |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

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

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

Plant A

(a) One (1) Truck and dumpster unloading of solid waste to storage pile operation, constructed in 2021, with a maximum throughput of 67.63 tons per hour of mixed recycled waste, exhausting to atmosphere.

*Note: Each dumpster holds a maximum of 5 tons, and a maximum of 250 trucks are emptied per day.*

(b) One (1) partially enclosed mixed recycling and waste storage pile, constructed in 2021, with negligible air emissions.

(c) One (1) sorting of mixed recycled waste operation, partially enclosed, constructed in 2021, with a maximum throughput of 67.63 tons of waste per hour sorted. The material is sorted into piles according to the following groups:

(1) Wood. Sent to Wood Grinder.
(2) Cardboard. This is baled.
(3) Metal.
(4) Concrete blocks and Brick.
(5) Mixed Trash/Non-Recyclable Materials.

(d) One (1) outdoor storage pile of substandard wood material, constructed in 2021, with a maximum size of 20 feet x 20 feet x 10 feet, or 0.5 acres.

*Note: This is temporary storage, before the material is transferred to dumpsters.*

(e) One (1) main sorting operation of recycled wood material going to the Grinder, constructed in 2021, with a rated maximum of 75 tons per hour, with the following conveyors/emission points, exhausting indoors.

(1) Conveyor 1 to Sorter.
(2) Convey 2 (larger items) and Conveyor 3 (smaller items) to Hand sorting.
(3) Hand sorting to Conveyor 4 (larger items) and Conveyor 5 (smaller items).
(4) Conveyor 4 and Conveyor 5 to facility floor, controlled by water mist spray.

(f) One (1) wood Grinder, constructed in 2021, with a rated maximum capacity of 45 tons per hour, and exhausting indoors.

(g) One (1) wood material handling and storage operation, transporting material to and from the grinder, constructed in 2021, with the following emission points;

(1) Front end loader feeding Grinder, with a maximum throughput of 45 tons per hour.
(2) Wood chip storage pile, partially enclosed.
(3) Loading of wood chip pile to truck each day, with a maximum throughput of 45 tons per hour.

(h) One (1) natural gas-fired roof top heater, constructed in 2024, with a maximum rated heat input capacity of 0.018 MMBtu/hr, and exhausting outside.

(i) Paved and unpaved roads.

Plant B

(j) One (1) front loader transport operation of waste and recycled metal materials from CW Recycling facility (Plant A) to dumpsters or outdoor storage piles located at Renascent, Inc. (Plant B), constructed in 2022, with a maximum transported material of 56.36 tons per hour.

(k) One (1) outdoor storage pile of cables and wires, constructed in 2022, with negligible air emissions.

(l) One (1) partially enclosed storage system, with pile(s) and/or dumpster(s) of scrap metal, constructed in 2022, with negligible air emissions.

(m) Nonferrous metal processing, constructed in 2022, exhausting indoors, including the following;

(1) One (1) sorting process, by hand or excavator, with negligible air emissions.
(2) Wire stripping by electrical machines with negligible air emissions.
(3) One (1) Granulator-Buidetti Sincro 530 Mill-with a maximum rated throughput of 1,500 pounds per hour, controlled by a cyclone and dust collector, and exhausting through a stack into the building.

(n) One (1) outdoor pallet storage area with negligible air emissions.

(o) One (1) diesel tank used to store on road fuel, identified as Diesel Tank 1, constructed in 2022, with a maximum capacity of 12,000 gallons, and a calculated maximum anticipated diesel throughput of 778,744 gallons per year.

(p) One (1) diesel tank used to store off road fuel, identified as Diesel Tank 2, constructed in 2022, with a maximum capacity of 6,000 gallons, and a calculated maximum anticipated diesel throughput of 82,009 gallons per year.

(q) Paved and unpaved roads.

## SECTION B GENERAL CONDITIONS

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

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 2-1.1-1) 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]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 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 described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.

(b) If actual construction of the emission units differs from the construction described in the application, the source may not continue 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 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M097-50167-00973, 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

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

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

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

B.9 Duty to Provide Information

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

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

(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
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

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.

(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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M097-50167-00973 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.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

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

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing an administrative amendment. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 Credible Evidence [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 2-6.1-5(a)(1)]**

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

C.6 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(c).

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

**Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

C.7 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
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

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

**Compliance Requirements [326 IAC 2-1.1-11]**

C.8 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 2-6.1-5(a)(2)]**

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Instrument Specifications [326 IAC 2-1.1-11]

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

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

**Corrective Actions and Response Steps**

C.11 Response to Excursions or Exceedances

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.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, startups, or shutdowns of any emission unit or emission control equipment, that result in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment: 1) results in violations of applicable air pollution control regulations or applicable emissions limitations and 2) lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages) or its equivalent. Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction under subsection (b) of this condition of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) 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.

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

**Emissions Unit Description:**

Plant A

(a) One (1) Truck and dumpster unloading of solid waste to storage pile operation, constructed in 2021, with a maximum throughput of 67.63 tons per hour of mixed recycled waste, exhausting to atmosphere.

*Note: Each dumpster holds a maximum of 5 tons, and a maximum of 250 trucks are emptied per day.*

(c) One (1) sorting of mixed recycled waste operation, partially enclosed, constructed in 2021, with a maximum throughput of 67.63 tons of waste per hour sorted. The material is sorted into piles according to the following groups:

(1) Wood. Sent to Wood Grinder.
(2) Cardboard. This is baled.
(3) Metal.
(4) Concrete blocks and Brick.
(5) Mixed Trash/Non-Recyclable Materials.

(d) One (1) outdoor storage pile of substandard wood material, constructed in 2021, with a maximum size of 20 feet x 20 feet x 10 feet, or 0.5 acres.

*Note: This is temporary storage, before the material is transferred to dumpsters.*

(e) One (1) main sorting operation of recycled wood material going to the Grinder, constructed in 2021, with a rated maximum of 75 tons per hour, with the following conveyors/emission points, exhausting indoors.

(1) Conveyor 1 to Sorter.
(2) Convey 2 (larger items) and Conveyor 3 (smaller items) to Hand sorting.
(3) Hand sorting to Conveyor 4 (larger items) and Conveyor 5 (smaller items).
(4) Conveyor 4 and Conveyor 5 to facility floor, controlled by water mist spray.

(f) One (1) wood Grinder, constructed in 2021, with a rated maximum capacity of 45 tons per hour, and exhausting indoors.

(g) One (1) wood material handling and storage operation, transporting material to and from the grinder, constructed in 2021, with the following emission points;

(1) Front end loader feeding Grinder, with a maximum throughput of 45 tons per hour.
(2) Wood chip storage pile, indoors.
(3) Loading of wood chip pile to truck each day, with a maximum throughput of 45 tons per hour.

(h) One (1) natural gas-fired roof top heater, constructed in 2024, with a maximum rated heat input capacity of 0.018 MMBtu/hr, and exhausting outside.

Plant B

(j) One (1) front loader transport operation of waste and recycled metal materials from CW Recycling facility (Plant A) to dumpsters or outdoor storage piles located at Renascent, Inc. (Plant B), constructed in 2022, with a maximum transported material of 56.36 tons per hour.

(k) One (1) outdoor storage pile of cables and wires, constructed in 2022, with negligible air emissions.

(l) One (1) partially enclosed storage system, with pile(s) and/or dumpster(s) of scrap metal, constructed in 2022, with negligible air emissions.

(m) Nonferrous metal processing, constructed in 2022, exhausting indoors, including the following;

(1) One (1) sorting process, by hand or excavator, with negligible air emissions.
(2) Wire stripping by electrical machines with negligible air emissions.
(3) One (1) Granulator-Buidetti Sincro 530 Mill, with a maximum rated throughput of 1,500 pounds per hour, controlled by a cyclone and dust collector, and exhausting through a stack into the building.

(n) One (1) outdoor pallet storage area with negligible air emissions.

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

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

D.1.1 Particulate Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the recycled waste material handling operations, wood grinder, roof top heater, metal wire processing operation, and storage piles shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

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

A Preventive Maintenance Plan is required for these facilities and any 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**

D.1.3 Particulate Matter Control

In order to assure compliance with Condition D.1.1, the cyclone and dust collector for particulate matter control shall be in operation and control emissions from the Granulator-Buidetti Sincro 530 Mill facility at all times the Granulator-Buidetti Sincro 530 Mill facility is in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
**OFFICE OF AIR QUALITY**
**COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT**
**ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

| | |
|---|---|
| **Company Name:** | CW Recycling |
| **Source Address:** | 2105 Enterprise Park Place |
| **City:** | Indianapolis, Indiana 46218 |
| **Phone #:** | (317) 245-6400 |
| **MSOP #:** | M097-50167-00973 |

I hereby certify that CW Recycling is:
☐ still in operation.
☐ no longer in operation.

I hereby certify that CW Recycling is:
☐ in compliance with the requirements of MSOP M097-50167-00973.
☐ not in compliance with the requirements of MSOP M097-50167-00973.

| | |
|---|---|
| **Authorized Individual (typed):** | |
| **Title:** | |
| **Signature:** | **Date:** |
| **Email Address:** | **Phone:** |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| **Noncompliance:** |
|---|
| |
| |
| |

Mail to: Permit Administration and Support Section
Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

CW Recycling
2105 Enterprise Park Place
Indianapolis, Indiana 46218

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that CW Recycling, 2105 Enterprise Park Place, Indianapolis, Indiana 46218, has constructed and will operate a cardboard, wood, metal, and vinyl siding recycling operations on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on March 12, 2026 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M097-50167-00973, Plant ID No. 097-00973 issued on _____.

5. **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)
)SS
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_____
Name_____ (typed or printed)

If the source location has been given an Enhanced 911 service address that is different than the source location address specified in the current permit, please provide the Enhanced 911 service address in the space below and please submit a permit application to modify the permit to specify the Enhanced 911 service address.

| _____ | _____ | _____ | _____ |
|---|---|---|---|
| *(Location* Address*)* | *(City)* | *(State)* | *(ZIP Code)* |

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
**OFFICE OF AIR QUALITY**
**COMPLIANCE AND ENFORCEMENT BRANCH**
**FAX NUMBER: (317) 233-6865**
**EMAIL: AirCompl@idem.in.gov**

Source Name: CW Recycling
Source Address: 2105 Enterprise Park Place, Indianapolis, Indiana 46218
MSOP Permit No.: M097-50167-00973

For any malfunction lasting one (1) hour or longer, the Permittee must submit this form to the Office of Air Quality (OAQ), within four (4) daytime business hours of malfunction start.

If any of the following are not applicable, mark N/A. This form consists of two (2) pages.

Page 1 of 2

| |
|---|
| This malfunction resulted in a violation of the following Indiana Administrative Code, permit condition, and/or permit limit and meets the definition of "malfunction" as listed on reverse side (e.g., 326 IAC 5-1, Permit Condition D.1.1, 40 CFR 60.62, etc.): |

| |
|---|
| Describe affected facility/equipment/operation (e.g., Coating Line #2, Boiler D, Diesel engine, No. 3 smelter, etc.): |
| Control equipment (e.g., Baghouse B4, Thermal oxidizer for Paint Line #1, etc.): |
| Description of the malfunction and cause: |

| | |
|---|---|
| When the malfunction started: | Date (MM/DD/YYYY): |
| | Time (HH:MM): |
| When the malfunction was corrected or is expected to be corrected: | Date (MM/DD/YYYY): |
| | Time (HH:MM): |

| |
|---|
| Type of pollutant(s) emitted (e.g., PM, PM10, PM2.5, VOC, etc.): |
| Estimated amount of pollutant(s) emitted during malfunction (e.g., VOC at 35 lbs/hr, 5 tons of PM, etc.): |
| Describe the corrective actions and interim control measures taken to minimize emissions (e.g., shut coating line down, isolated failing baghouse compartment, idled furnace operations until repairs completed, etc.): |

Form completed by: _____

Title/position: _____

Signature:_____

Date:_____

Phone: _____

Email: _____

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1, 326 IAC 2-6.1, 326 IAC 2-7, or 326 IAC 2-8.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

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

# Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit (MSOP)

## Source Description and Location

| | |
|---|---|
| **Source Name:** | **CW Recycling** |
| **Source Location:** | **2105 Enterprise Park Place, Indianapolis, IN 46218** |
| **County:** | **Marion** |
| **SIC Code:** | **5093 (Scrap and Waste Material)** |
| **Operation Permit No.:** | **M097-50167-00973** |
| **Permit Reviewer:** | **Sarah Germann** |

On March 12, 2026, the Office of Air Quality (OAQ) received an application from CW Recycling related to the construction and operation of a new cardboard, wood, metal, and vinyl siding recycling operation.

## Source Definition

The following plants are considered in the source determination:

(a) Plant A: CW Recycling, located at 2105 Enterprise Park Place, Indianapolis, IN 46218 (Source ID: 097-00973), which is a cardboard, wood, metal, and vinyl siding recycling operation.

(b) Plant B: Renascent, Inc., located at 2105 Enterprise Park Place, Indianapolis, IN 46218 (no source ID), which is a non-ferrous materials operation.

(c) Plant C: Renascent, Inc., located at 3555 East 21st Street, Indianapolis, IN 46219 (Source ID: 777-05414), which is a portable concrete crushing plant operating under MSOP Renewal M777-44642-05414 and Significant Permit Revision 777-46341-05414.

This source determination has been written to analyze 1) if Plant A and Plant B, both located at 2105 Enterprise Park Place, are part of the same source, and 2) if Plant C, located on East 21st Street, is part of the same source as Plants A and/or Plant B.

IDEM, OAQ has examined whether these plants are part of the same source. The term “source” is defined at 326 Indiana Administrative Code 1-2-73. The Indiana Administrative Code is available at http://www.in.gov/legislative/iac/iac_title?iact=326 on the Internet. In order for these plants to be considered as a single source, all three of the following criteria must be met:

(a) The plants must have common ownership and/or control;

(b) The plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility to the other; and

(c) The plants must be located on the same, contiguous or adjacent properties.

**First Criteria - Common Ownership or Control:**
The first criteria to be considered is whether these plants are under common ownership or control. IDEM’s Nonrule Policy Document Air-005 applies to the definition of “major source” in 326 IAC 2-7-1(20). Since the definition of major source and source are almost identical, Air-005 is also helpful guidance in defining a source. All of IDEM’s nonrule policy documents are available at https://www.in.gov/idem/resources/nonrule-policies/effective-nonrule-policies/ on IDEM’s website. NPD Air-005 states:

Common ownership may exist in several forms.

- If a third party has ownership of fifty-one percent (51%) or more in each of two (2) or more entities, common ownership exists.
- If two (2) or more entities share common corporate officers, in whole or in substantial part, who are responsible for the day-to-day operations of the entities, common ownership exists.
- If one entity has fifty-one percent (51%) or greater ownership of another entity, common ownership exists.

*Plant A, Plant B, and Plant C*
Renascent owns 100% of CW Recycling. Renascent officers are responsible for day to day operation of all three plants. The first criteria is satisfied for these three plants being the same source.

**Second Criteria - Common SIC Code or Support Facility:**
The second criteria is whether either of the plants have a common two-digit Standard Industrial Classification (SIC) Code or if one plant serves as a support facility for the other plant. The Standard Industrial Classification Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at https://www.osha.gov/data/sic-manual on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant.

*Plant A and Plant B*
Plant A and Plant B both have the SIC code 5093 (Scrap and Waste Material). Therefore, the two plants have the same Major SIC Code and the second criteria is satisfied.

*Plants A/B and Plant C*
Plant C has the SIC code 1422 (Crushed and Broken Limestone), which is a different Major SIC Code than Plants A and B. Plant C has the Major SIC Code 14, while Plants A and B have the Major SIC Code 50. The second criteria is not satisfied for Plant C being a part of the same source as Plants A and B when evaluating for the same Major SIC code.

Support Facility Relationship
A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant.

The percentage of each plant's output which is provided to each of the other plants is listed below.

A to B = 5%
A to C = 5%
B to A = 0%
B to C = 0%
C to A = 0%
C to B = 0%

*Plants A/B and Plant C*
Less than 50% of the outputs from Plants A and B are provided to Plant C. The second criteria is not met for Plant C being a part of the same source as Plants A and B.

**Third Criteria - Same, Contiguous, or Adjacent Properties:**
The third and last criteria of the source definition is whether the plants are on the same, contiguous or adjacent properties. Plants located on properties that share a common property border are contiguous.

*Plant A and Plant B*
Plant A and Plant B are located on the same property, therefore the third criteria for these two plants being a part of the same source is met.

Plants A/B and C

Plant C is not located on the same or a contiguous property. Plant C is located one mile from Plants A and B at Enterprise Park Place.

Adjacent Determination:
The term "adjacent" is not defined in Indiana's rules. IDEM's Nonrule Policy Document, NPD Air-005 adds the following guidance:

- Properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- Properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- Other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

(1) Are materials routinely transferred between the plants?
(2) Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
(3) Is the production process itself split in any way between the plants?

These questions focus on whether the separate sources are so interrelated that they are functioning as one plant and whether the distance between them is small enough that it enables them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarty issued a memorandum on September 22, 2009 that confirmed U.S. EPA's view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plant properties are adjacent.

*Plants A/B and Plant C*
Plant C is located one mile from Plants A and B at Enterprise Park Place. Only 5% of materials are transferred from Plant A to Plant C. No materials are transferred between Plant B and Plant C. There are no production employees or production managers that travel between the plants. There is not any production split between the plants. The third criteria is not met for Plant C being part of the same source as Plants A and B.

**Source Determination - Final Conclusion:**

*Plant A and Plant B*
CW Recycling is fully owned by Renascent, Inc., and the same officers are responsible for operations at CW Recycling and the Renascent, Inc. Plant B location. Therefore, the first criteria for being considered a single source is met. Plant A and Plant B both have the same Major SIC Code, meeting the second criteria for a single source. Plant A and Plant B are located on the same property, meeting the third criteria for a single source. IDEM OAQ has determined that Plant A and Plant B are a part of the same source.

*Plants A/B and Plant C*
Plant C is owned and operated by the same company who own Plant A and Plant B. The first criteria for being a single source is met. However, Plant C does not meet the second or the third criteria for being a single source with Plants A and B. Plant C operates under a different Major SIC code, and does not have a support facility relationship with Plant A or Plant B. Plant C is not located on the same, continuous, or adjacent properties with either Plant A or Plant B. IDEM OAQ has determined that Plant C is a separate source from Plant A and Plant B.

## Existing Approvals

There have been no previous approvals issued to this source.

## County Attainment Status

The source is located in Marion County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

| Pollutant | Designation |
|---|---|
| $SO_2$ | Attainment effective May 21, 2020, for the 2010 $SO_2$ primary 1-hour standard for Center, Perry, and Wayne townships. Unclassifiable or attainment effective April 9, 2018, for the remainder of the county. Better than national secondary standards effective March 3, 1978. |
| CO | Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County. |
| $O_3$ | Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard. |
| $PM_{2.5}$ | Unclassifiable or attainment effective April 15, 2015, for the 2012 annual $PM_{2.5}$ standard. |
| $PM_{2.5}$ | Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour $PM_{2.5}$ standard. |
| $PM_{10}$ | Unclassifiable effective November 15, 1990. |
| $NO_2$ | Unclassifiable or attainment effective January 29, 2012, for the 2010 $NO_2$ standard. |
| Pb | Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard. |

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

(b) $PM_{2.5}$
Marion County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, $SO_2$, and NOx emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

## Fugitive Emissions

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(20)(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 (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

The fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward the determination of MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

## Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at https://www.supremecourt.gov/opinions/opinions.aspx) 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.

## Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by CW Recycling on March 12, 2026, relating to the construction and operation of a new cardboard, wood, metal, and vinyl siding recycling operation.

The following is a list of the new emission units:

Plant A

(a) One (1) Truck and dumpster unloading of solid waste to storage pile operation, constructed in 2021, with a maximum throughput of 67.63 tons per hour of mixed recycled waste, exhausting to atmosphere.

*Note: Each dumpster holds a maximum of 5 tons, and a maximum of 250 trucks are emptied per day.*

(b) One (1) partially enclosed mixed recycling and waste storage pile, constructed in 2021, with negligible air emissions.

(c) One (1) sorting of mixed recycled waste operation, partially enclosed, constructed in 2021, with a maximum throughput of 67.63 tons of waste per hour sorted. The material is sorted into piles according to the following groups:

(1) Wood. Sent to Wood Grinder.
(2) Cardboard. This is baled.
(3) Metal.
(4) Concrete blocks and Brick.
(5) Mixed Trash/Non-Recyclable Materials.

(d) One (1) outdoor storage pile of substandard wood material, constructed in 2021, with a maximum size of 20 feet x 20 feet x 10 feet, or 0.5 acres.

*Note: This is temporary storage, before the material is transferred to dumpsters.*

(e) One (1) main sorting operation of recycled wood material going to the Grinder, constructed in 2021, with a rated maximum of 75 tons per hour, with the following conveyors/emission points, exhausting indoors.

(1) Conveyor 1 to Sorter.
(2) Convey 2 (larger items) and Conveyor 3 (smaller items) to Hand sorting.
(3) Hand sorting to Conveyor 4 (larger items) and Conveyor 5 (smaller items).
(4) Conveyor 4 and Conveyor 5 to facility floor, controlled by water mist spray.

(f) One (1) wood Grinder, constructed in 2021, with a rated maximum capacity of 45 tons per hour, and exhausting indoors.

(g) One (1) wood material handling and storage operation, transporting material to and from the grinder, constructed in 2021, with the following emission points;

(1) Front end loader feeding Grinder, with a maximum throughput of 45 tons per hour.
(2) Wood chip storage pile, indoors.
(3) Loading of wood chip pile to truck each day, with a maximum throughput of 45 tons per hour.

(h) One (1) natural gas-fired roof top heater, constructed in 2024, with a maximum rated heat input capacity of 0.018 MMBtu/hr, and exhausting outside.

(i) Paved and unpaved roads.

Plant B

(j) One (1) front loader transport operation of waste and recycled metal materials from CW Recycling facility (Plant A) to dumpsters or outdoor storage piles located at Renascent, Inc. (Plant B), constructed in 2022, with a maximum transported material of 56.36 tons per hour.

(k) One (1) outdoor storage pile of cables and wires, constructed in 2022, with negligible air emissions.

(l) One (1) partially enclosed storage system, with pile(s) and/or dumpster(s) of scrap metal, constructed in 2022, with negligible air emissions.

(m) Nonferrous metal processing, constructed in 2022, exhausting indoors, including the following;

(1) One (1) sorting process, by hand or excavator, with negligible air emissions.
(2) Wire stripping by electrical machines with negligible air emissions.
(3) One (1) Granulator-Buidetti Sincro 530 Mill, with a maximum rated throughput of 1,500 pounds per hour, controlled by a cyclone and dust collector, and exhausting through a stack into the building.

(n) One (1) outdoor pallet storage area with negligible air emissions.

(o) One (1) diesel tank used to store on road fuel, identified as Diesel Tank 1, constructed in 2022, with a maximum capacity of 12,000 gallons, and a calculated maximum anticipated diesel throughput of 778,744 gallons per year.

(p) One (1) diesel tank used to store off road fuel, identified as Diesel Tank 2, constructed in 2022, with a maximum capacity of 6,000 gallons, and a calculated maximum anticipated diesel throughput of 82,009 gallons per year.

(q) Paved and unpaved roads.

## Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit and operating rules.

## Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

## Permit Level Determination – MSOP

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.

| | Unrestricted Source-Wide Emissions (ton/year) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | **PM[1]** | **$PM_{10}$[1]** | **$PM_{2.5}$[1, 2]** | **$SO_2$** | **$NO_X$** | **VOC** | **CO** | **Total HAPs** |
| **Total PTE of Entire Source Excluding Fugitives*** | 120.53 | 58.28 | 58.28 | negl. | 0.01 | 0.03 | 0.01 | negl. |
| Title V Major Source Thresholds | -- | 100 | 100 | 100 | 100 | 100 | 100 | 25 |
| **Total PTE of Entire Source Including Source-Wide Fugitives*** | 127.25 | 59.92 | 58.53 | negl. | 0.01 | 0.03 | 0.01 | negl. |
| MSOP Thresholds | 25 | 25 | 25 | 25 | 25 | 25 | 100 | 25 |

[1]Under the Part 70 Permit program (40 CFR 70), $PM_{10}$ and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.

*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 2-1.1-1) of PM10 and PM2.5 from the entire source are each less the Title V major source threshold levels, but equal to or greater than the MSOP threshold levels. The potential to emit of all other regulated air pollutants from the entire source is less the MSOP threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).

(b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).

**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 the roof top heater, because it is not a steam generating unit and it has a maximum heat input capacity of less than 10 MMBtu/hr.

(b) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for the two diesel storage tanks at this source, because this subpart applies to storage vessels with a capacity of greater than or equal to 75 cubic meters (19,812.9 gallons) and these vessels store a maximum of 12,000 and 6,000 gallons, respecively.

(c) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023, 40 CFR 60, Subpart Kc and 326 IAC 12, are not included in the permit for the two diesel storage tanks at this source, since this subpart applies to storage vessels with a capacity of greater than or equal to 20,000 gallons (75.7 cubic meters) and these vessels store a maximum of 12,000 and 6,000 gallons, respectively. Additionally, both of these tanks were constructed in 2022 and this subpart only applies to storage vessels constructed after October 4, 2023.

(d) The requirements of the New Source Performance Standard for Primary Copper Smelters, 40 CFR 60, Subpart P and 326 IAC 12, are not included in the permit for this source, because it is not a primary copper smelter, as it is not engaged in the production of copper from copper sulfide ore consentrates through the use of pryrometallurgical techniques, and it does not have any dryers, roasters, spelting furnaces, or copper converters.

(e) The requirements of the New Source Performance Standard for Primary Aluminum Reduction Plants, 40 CFR 60, Subpart S and 326 IAC 12, are not included in the permit for this source, because it does not manufacture aluminum by electrolytic reduction, as defined in 40 CFR 60.191.

(f) The requirements of the New Source Performance Standard for Ferroalloy Production Facilities, 40 CFR 60, Subpart Z and 326 IAC 12, are not included in the permit for this source, because it does not have an electric submerged arc furnace and it does not produce any Ferroalloys.

(g) The requirements of the New Source Performance Standard for Metallic Mineral Processing Plants, 40 CFR 60, Subpart LL and 326 IAC 12, are not included in the permit for this source, because it is not a metallic mineral processing plant, according to the definition in §60.381, becasue it does not produce metallic mineral concentrates from ore.

(h) On May 21, 2021, U.S. EPA had a notice published in the Federal Register (86 FR 27756) promulgating a federal plan to implement 40 CFR 60, Subpart Cf; this plan became effective on June 21, 2021. As of the date of this Minor Sourse Operatings Permit's public notice, Indiana has not had a state plan implementing 40 CFR 60, Subpart Cf approved by the U.S. EPA, nor has Indiana had a negative declaration letter approved by the U.S. EPA. At such time that a state plan for Indiana is approved by the U.S. EPA and comes into effect, it shall take precedence over the federal plan. Pursuant to 40 CFR 62.13(b), after June 21, 2021, the substantive requirements of the municipal solid waste landfills federal plan are located under 40 CFR 62, Subpart OOO.

This source is not subject to the Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014, 40 CFR 62, Subpart OOO, because this source handles recycled waste materials and is not a landfill. Therefore, this source is not subject to the requirements of 40 CFR 62, Subpart OOO.

(i) The requirements of the New Source Performance Standard (NSPS) for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014, 40 CFR 60, Subpart XXX and 326 IAC 12, are still not included in this permit, because this source handles recycled waste material and is not a landfill.

(j) There are no 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 Primary Aluminum Reduction Plants, 40 CFR 63, Subpart LL and 326 IAC 20-24 are not included in the permit for this source, since it does not manufacture aluminum by electrolytic reduction, and it is not a major source of HAP.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Primany Copper Smelting, 40 CFR 63, Subpart QQQ are not included in the permit for this source, since none of its units are engaged in the production of copper from copper sulfide ore concentrates through the use of pyrometallurigal techiques, and thus they are not primary copper smelters as defined in §63.1459, and this source is not a major source of HAP.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Aluminum Production, 40 CFR 63, Subpart RRR and 326 IAC 20-70 are not included in the permit for plant B at this source, since the source is not a major source of HAP and it is not a secondary aluminum production facitilty as defined in 40 CFR 63.1503.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Municipal Solid Waste Landfills, 40 CFR 63, Subpart AAAA and 326 IAC 20-67 are not included in the permit for this source, since this is not a landfill, as defined in §63.1990, because it is not an area of land or an excavation in which waste is placed for permanent disposal.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, Subpart DDDD are not included in the permit because this cardboard, wood, metal, and vinyl siding recycling operation does not manufacture plywood or composite wood products, such as: plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit for the roof top heater at this source, since this source is not a major source of HAPs.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCCC are not included in the permit for the diesel tanks at this source, since this is not a gasoline dispensing facility (GDF).

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Primary Nonferrous Metals Area Sources—Zinc, Cadmium, and Beryllium, 40 CFR 63, Subpart GGGGGG are not included in the permit for plant B at this source, since it is not a primary beryllium production facility or a primary zinc production facility.

(i) 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 for the roof top heater, since it is not a boiler.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Nonferrous Metals Processing Area Sources, 40 CFR 63, Subpart TTTTTT are not included in the permit for this source, since this source is not a secondary nonferrous metals processing facility as defined in §63.11472.

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX are not included in the permit for this source, since it is not primarily engaged in operations in one of the nine source categories listed in §63.11514(a)(1) through (9) which are as follows;

(1) Electrical and Electronic Equipment Finishing Operations;
(2) Fabricated Metal Products;
(3) Fabricated Plate Work (Boiler Shops);
(4) Fabricated Structural Metal Manufacturing;
(5) Heating Equipment, except Electric;
(6) Industrial Machinery and Equipment Finishing Operations;
(7) Iron and Steel Forging;
(8) Primary Metal Products Manufacturing; and
(9) Valves and Pipe Fittings.

(l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Ferroalloys Production Facilities, 40 CFR 63, Subpart YYYYYY are not included in the permit for this source, since it is not a ferroalloys production facility as described in §63.11524(a). It does not manufacture silicon metal, ferrosilicon, ferrotitanium using the aluminum reduction process, ferrovanadium, ferromolybdenum, calcium silicon, silicomanganese zirconium, ferrochrome silicon, silvery iron, high-carbon ferrochrome, charge chrome, standard ferromanganese, silicomanganese, ferromanganese silicon, calcium carbide or other ferroalloy products using electrometallurgical operations including electric arc furnaces (EAFs) or other reaction vessels.

(m) There are no 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 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 2-6.1 (Minor Source Operating Permits (MSOP))**
MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**
PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

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

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

(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4:

(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)**
The source is subject to the requirements of 326 IAC 6-4, because the paved and unpaved roads have the potential to emit fugitive particulate emissions. 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)**
This source (located in Marion County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.5-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

**326 IAC 6.8 (Particulate Matter Limitations for Lake County)**
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Marion County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

**326 IAC 6.8 (Lake County: Fugitive Particulate Matter)**
Pursuant to 326 IAC 6.8-10-1, this source (located in Marion County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

**State Rule Applicability – Individual Facilities**

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

Recycled Waste Material Handling

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-1(c)(3), the recycled waste material handling process is not subject to the requirements of 326 IAC 6-3, since it is suject to 326 IAC 6.5, which is more stringent.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**
This source is subject to the requirements of 326 IAC 6.5-1-2. Therefore, pursuant to 6.5-1-2(a), PM

emissions from the recycled waste material handling operations shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Wood Grinder

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-1(c)(3), the wood grinder is not subject to the requirements of 326 IAC 6-3, since it is suject to 326 IAC 6.5, which is more stringent.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**
This source is subject to the requirements of 326 IAC 6.5-1-2. Therefore, pursuant to 6.5-1-2(a), PM emissions from the wood grinder shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Roof Top Heater

**326 IAC 6-2-1 (Particulate Matter Emission Limitations for Sources of Indirect Heating)**
Pursuant to 326 IAC 6-2-1 (a), the roof top heater is not subject to the provision of 326 IAC 6-2-4, since the roof top heater is not a source of indirect heating.

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-1(c)(3), the roof top heater is not subject to the requirements of 326 IAC 6-3, since it is suject to 326 IAC 6.5, which is more stringent.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**
This source is subject to the requirements of 326 IAC 6.5-1-2. Therefore, pursuant to 6.5-1-2(a), PM emissions from the roof top heater shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

**326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)**
This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has 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 this roof top heater was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its 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 roof top heater, 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 roof top heater, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Metal Wire Processing

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-1(c)(3), the metal wire processing operation is not subject to the requirements of 326 IAC 6-3, since it is suject to 326 IAC 6.5, which is more stringent.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**
This source is subject to the requirements of 326 IAC 6.5-1-2. Therefore, pursuant to 6.5-1-2(a), PM emissions from the wood grinder shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Storage Piles

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-1(c)(3), the storage piles are not subject to the requirements of 326 IAC 6-3, since they are suject to 326 IAC 6.5, which is more stringent.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**
This source is subject to the requirements of 326 IAC 6.5-1-2. Therefore, pursuant to 6.5-1-2(a), PM emissions from the storage piles shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Diesel Tanks

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**
Even though these diesel tanks 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 8-4-3 (VOC Rules: Petroleum Liquid Storage Facilities)**
Pursuant to 326 IAC 8-4-3(a) these tanks are not subject to this rule because they are not petroleum tanks, they hold diesel fuel, and they each have a capacity of less than 39,000 gallons.

**326 IAC 8-9 (VOC Rules: Volatile Organix Liquid Storage Vessels)**
Pursuant to 326 IAC 8-9-1(a) this source is not subject to this rule because it is located in Marion county. It is not located in Clark, Floyd, Lake, or Porter county.

## Compliance Determination and Monitoring Requirements

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

IDEM OAQ has determined that testing of the recycled waste material handling operations, wood grinder, roof top heater, metal wire processing operation, or storage piles is not required at this time to determine compliance with the particulate matter emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.

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

There are no compliance requirements applicable to this source.

## 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 March 12, 2026. Additional information was received on August 14, October 7, and October 30, 2026.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M097-50167-00973. The staff recommends to the Commissioner that the New Source Construction and MSOP be approved.

**IDEM Contact**

(a) If you have any questions regarding this permit, please contact Sarah Germann, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, Indiana Government Center North, 100 North Senate Avenue, Room 13W, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6555 or (800) 451-6027, and ask for Sarah Germann or (317) 234-6555.

(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: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens' Guide to IDEM on the Internet at: https://www.in.gov/idem/about/citizens-guide-to-idem.

**Appendix A: Emission Calculations**
**PTE Summary**

**Company Name:** CW Recycling
**Source Address:** 2105 Enterprise Park Place, Indianapolis, IN 46218
**Permit Number:** M097-50167-00973
**Reviewer:** Sarah Germann

| Uncontrolled Potential to Emit (tons/yr) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **Emissions Unit** | **PM** | **PM10** | **PM2.5 *** | **$SO_2$** | **NOx** | **VOC** | **CO** | **Total HAPs**** |
| Material Handling | 50.22 | 17.53 | 17.53 | - | - | - | - | - |
| Wood Grinder | 68.99 | 39.42 | 39.42 | - | - | - | - | - |
| Roof Top Heater | 1.47E-04 | 5.87E-04 | 5.87E-04 | 4.64E-05 | 0.01 | 4.25E-04 | 0.01 | 1.46E-04 |
| Metal and Wire Processing | 1.32 | 1.32 | 1.32 | - | - | - | - | - |
| Diesel Tanks | - | - | - | - | - | 0.03 | - | - |
| **Total Excluding Fugitives** | **120.53** | **58.28** | **58.28** | **4.64E-05** | **0.01** | **0.03** | **0.01** | **1.46E-04** |
| ***Fugitive Emissions*** | | | | | | | | |
| *Storage Piles* | 0.44 | 0.16 | 0.02 | - | - | - | - | - |
| *Paved Roads* | *2.74* | *0.55* | *0.13* | - | - | - | - | - |
| *Unpaved Roads* | *3.54* | *0.94* | *0.09* | - | - | - | - | - |
| ***Total Fugitives*** | ***6.72*** | ***1.65*** | ***0.25*** | ***0.00*** | ***0.00*** | ***0.00*** | ***0.00*** | ***0.00*** |
| **Total Including Fugutives** | **127.25** | **59.92** | **58.53** | **4.64E-05** | **0.01** | **0.03** | **0.01** | **1.46E-04** |

** PM2.5 listed is direct PM2.5*

***Fugitve HAP emissions are always included in the source-wide emissions*

**Appendix A: Emission Calculations**
**Material Handling**

**Company Name:** **CW Recycling**
**Source Address:** **2105 Enterprise Park Place, Indianapolis, IN 46218**
**Permit Number:** **M097-50167-00973**
**Reviewer:** **Sarah Germann**

| | | Emission Factors [1, 2] | | Uncontrolled Emissions | | |
|---|---|---|---|---|---|---|
| Emission Process | Maximum Capacity (ton/hr) | PM Emission Factor (lb/ton) | Emission Factor PM10/PM2.5 (lb/ton) | PTE PM (lb/hr) | PTE PM (ton/yr) | PTE PM10/PM2.5 (ton/yr) |
| **Mixed recycled material (Plant A)** | | | | | | |
| Truck and Dumpster unloading of Mixed Recycled Maste [3] | 67.63 | 0.025 | 0.0087 | 1.6908 | 7.41 | 2.58 |
| Sorting of Mixed Recycled Material [3] | 67.63 | 0.025 | 0.0087 | 1.6908 | 7.41 | 2.58 |
| **Recycled Wood Main Sorting Operation (Plant A)** | | | | | | |
| Conveyor 1 (to sorter) | 75.0 | 0.003 | 0.0011 | 0.225 | 0.99 | 0.36 |
| Sorter (to conveyors 2 and 3) | 75.0 | 0.025 | 0.0087 | 1.875 | 8.21 | 2.86 |
| Conveyor 2 (hand sorting , then goes to to conveyor 4) | 37.5 | 0.003 | 0.0011 | 0.1125 | 0.49 | 0.18 |
| Conveyor 3 (hand sorting, then goes to conveyor 5) | 37.5 | 0.003 | 0.0011 | 0.1125 | 0.49 | 0.18 |
| Conveyor 4 (to floor) | 37.5 | 0.003 | 0.0011 | 0.1125 | 0.49 | 0.18 |
| Conveyor 5 (to floor) | 37.5 | 0.003 | 0.0011 | 0.1125 | 0.49 | 0.18 |
| Sorting and handing (drop to floor, controlled by mist) | 75.0 | 0.025 | 0.0087 | 1.875 | 8.21 | 2.86 |
| **Wood material handling for Ground wood (Plant A)** | | | | | | |
| Front end loader feeding grinder | 45.0 | 0.025 | 0.0087 | 1.125 | 4.93 | 1.71 |
| Loading of Wood chips to truck | 45.0 | 0.025 | 0.0087 | 1.125 | 4.93 | 1.71 |
| **Transport to Plant B** | | | | | | |
| Front end loader wire and metal to dumpsters/storage pile | 56.36 | 0.025 | 0.0087 | 1.409 | 6.17 | 2.15 |
| | | | **Total** | **11.4656** | **50.22** | **17.53** |

**Notes:**

[1] Emission factors for loading, unloading, and sorting of waste material are from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-02, 03) which is originially for screening of crushed stone.

[2] Emission factors for conveying of waste material are from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) which is originally for uncontrolled conveyor transfer point of crushed stone.

[3] The average tons per hour was calculated like by taking 190 average trucks per day x 3.25 average tons per load / 11 hours = 53.36 ton/hr. These values were provided by the source. The average of 53.36 ton/hr was multiplied by a safety factor of 20% for the maximum throughput of material.

**Methodology:**

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

**Appendix A: Emission Calculations**
**PTE Summary**

**Company Name:** **CW Recycling**
**Source Address:** **2105 Enterprise Park Place, Indianapolis, IN 46218**
**Permit Number:** **M097-50167-00973**
**Reviewer:** **Sarah Germann**

| Process | Maximum Capacity ton/hr | PM Emission Factor lb/ton | PM10 Emission Factor lb/ton | PM PTE lb/hr | PM10/PM2.5 PTE lb/hr | PM PTE ton/yr | PM10/PM2.5 PTE ton/yr |
|---|---|---|---|---|---|---|---|
| Wood Grinder | 45 | 0.35 | 0.20 | 15.75 | 9.00 | 68.99 | 39.42 |

Methodology
Hourly emissions = Maximum Capacity (Tons/hour) * PM Emission Factor (lb/ton)
Annual Emissions = Hourly Emissions (lb/hour) * 8760 (hours/year) * 1 Ton/2000 lbs
PM and PM 10 Emissions from EPA WebFIRE database, Sawmill Operations - Log Sawing (3-07-008-02).
PM2.5 = PM10

**Appendix A: Emissions Calculations**
**Natural Gas Combustion ( ≤ 100 MMBtu/hr)**

**Company Name:** **CW Recycling**
**Source Address:** **2105 Enterprise Park Place, Indianapolis, IN 46218**
**Permit Number:** **M097-50167-00973**
**Reviewer:** **Sarah Germann**

| Heat Input Capacity MMBtu/hr | HHV mmBtu / mmscf | Potential Throughput MMCF/yr |
|---|---|---|
| 0.018 | 1020 | 0.2 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emission in tons/yr | 1.47E-04 | 5.87E-04 | 5.87E-04 | 4.64E-05 | 0.01 | 4.25E-04 | 0.01 |

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

**Hazardous Air Pollutants (HAPs)**

| | HAPs - Organics | | | | |
|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 1.6E-07 | 9.3E-08 | 5.8E-06 | 1.4E-04 | 2.6E-07 |

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 3.9E-08 | 8.5E-08 | 1.1E-07 | 2.9E-08 | 1.6E-07 |

| | | |
|---|---|---|
| **Potential Emission of Combined HAPs (tons/yr)** | **1.5E-04** | |
| **Potential Emission of Highest Single HAP (tons/yr)** | **1.4E-04** | **Hexane** |

**Methodology**
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.

## Appendix A: Emission Calculations
## Wire Recovery & Recycling Operations

**Company Name:** CW Recycling
**Source Address:** 2105 Enterprise Park Place, Indianapolis, IN 46218
**Permit Number:** M097-50167-00973
**Reviewer:** Sarah Germann

| Emission Unit | Quantity | Maximum Throughput* (ton/hr) | Emission Factors [1] (lb/ton) | | | Uncontrolled PTE (lb/hr) | Uncontrolled PTE (tpy) | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | PM | $PM_{10}$ | $PM_{2.5}$ | PM | PM | $PM_{10}$ | $PM_{2.5}$ |
| Granulator | 1 | 0.8 | 0.403 | 0.403 | 0.403 | 0.302 | 1.32 | 1.32 | 1.32 |
| | | | | | **Total:** | **0.302** | **1.32** | **1.32** | **1.32** |

*Source provided that the granulator processes 1,500 lb/hr of metal wire.

**Notes:**

[1]The emission factors for the granulators, separation tables, turbo mills, & zig zag are from the Title V Applicability Workbook Prepared for Institute of Scrap Recycling Industries, Inc., Appendix D, Table D-10.E. The emission factors presented are the emission rates after the use of control devices; therefore, the uncontrolled emission factors were derived by back-calculating with an assumed control efficiency of 90%. Since no $PM_{10}$ or $PM_{2.5}$ emission factors are listed, it is conservatively assumed that the $PM_{10}$ & $PM_{2.5}$ emission factors are equal to the PM emission factors.

**Methodology:**

Granulators/Separation Tables/Turbo Mills Emission Factor (lb/ton) = 0.0403 × [1 - 0.9]
Uncontrolled PTE (tpy) = Quantity × Maximum Throughput (ton/hr) × Emission Factor (lb/ton) × 8,760 (hr/yr) ÷ 2,000 (lb/ton)

**Emission Calculations**
**Diesel Fuel Transfer, Storage, and Dispensing Operations**
**Volatile Organic Compounds and Hazardous Air Pollutants (HAPs)**

**Company Name:** **CW Recycling**
**Source Address:** **2105 Enterprise Park Place, Indianapolis, IN 46218**
**Permit Number:** **M097-50167-00973**
**Reviewer:** **Sarah Germann**

**Diesel Fuel Transfer, Storage, and Dispensing Operations**

To calculate evaporative emissions from the diesel dispensing fuel transfer and dispensing operation emission factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids were used. The total potential emission of VOC is as follows:

Maximum Anticipated Diesel Throughput = 778,744 gallons/yr (see Note 1)
Diesel Tank Storage Capacity = 12,000 gallons

| Emission Source | Emission Factor (lb/kgal of throughput)* | Emission Factor (lb/week-kgal storage)* | PTE of VOC (tons/yr) |
|---|---|---|---|
| Dispensing diesel into storage tanks (splash loading, dedicated normal service) | 0.03 | | 0.0116812 |
| Dispensing diesel into vehicle tanks (splash loading, dedicated normal service) | 0.03 | | 0.0116812 |
| Tank breathing losses | | 0.005 | 1.56E-03 |
| | | **Total** | **0.02** |

**Methodology**
Note 1: Maximum Anticipated Diesel Throughput is based on the annual projected throughput provided by the source. The projected on road fuel throughput, which is stored in Diesel Tank 1, is 648,953 gallons per year. A 20% safety factor was used, since this is the projected throughput.
*Emission Factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids (dated 6/08), Tables 5.2-5 and 5.2-6, for diesel at a temperature of 16°C (60°F).
PTE of VOC (tons/yr) = [Maximum Anticipated Diesel Throughput (gallon/yr)] * [Emission Factor (lb/kgal)] * [kgal/1000 gallons] * [ton/2000 lb]
PTE of VOC (tons/yr) = [Diesel Tank Storage Capacity (gallon)] * [Emission Factor (lb/week-kgal)] * [52 weeks/yr] * [kgal/1000 gallons] * [ton/2000 lb]

**Hazardous Air Pollutants (HAPs)**

| | Vapor HAP Content (% by weight)* | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Product | Benzene | Ethylbenzene | n-Hexane | Toluene | Total Xylenes | Total HAPs | PTE of Total HAPs (tons/yr) | PTE of Highest Single HAP (tons/yr) | Highest Single HAP |
| Diesel (Distillate Fuel Oil No. 2) | 0.21% | 0.31% | 0.04% | 2.36% | 5.79% | 8.71% | 0.002 | 0.001 | Xylene |
| | | | | | | **Totals** | **0.002** | **0.001** | **Xylene** |

**Methodology**
*Vapor HAP content (% by weight) data are from TANKS (Version 4.0.9d) partial speciation profiles based on standard ambient temperature (25°C / 77°F).
PTE of Total HAPs (tons/yr) = [Total HAP Content (% by weight)] * [PTE of VOC (tons/yr)]
PTE of Worst Single HAP (tons/yr) = [Worst Single HAP Content (% by weight)] * [PTE of VOC (tons/yr)]

**Abbreviations**
PTE = Potential to Emit
VOC = Volatile Organic Compounds
HAP = Hazardous Air Pollutant

**Emission Calculations**
**Diesel Fuel Transfer, Storage, and Dispensing Operations**
**Volatile Organic Compounds and Hazardous Air Pollutants (HAPs)**

**Company Name:** CW Recycling
**Source Address:** 2105 Enterprise Park Place, Indianapolis, IN 46218
**Permit Number:** M097-50167-00973
**Reviewer:** Sarah Germann

**Diesel Fuel Transfer, Storage, and Dispensing Operations**

To calculate evaporative emissions from the diesel dispensing fuel transfer and dispensing operation emission factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids were used. The total potential emission of VOC is as follows:

Maximum Anticipated Diesel Throughput = 82,009 gallons/yr (see Note 1)
Diesel Tank Storage Capacity = 6,000 gallons

| Emission Source | Emission Factor (lb/kgal of throughput)* | Emission Factor (lb/week-kgal storage)* | PTE of VOC (tons/yr) |
|---|---|---|---|
| Dispensing diesel into storage tanks (splash loading, dedicated normal service) | 0.03 | | 0.0012301 |
| Dispensing diesel into vehicle tanks (splash loading, dedicated normal service) | 0.03 | | 0.0012301 |
| Tank breathing losses | | 0.005 | 7.80E-04 |
| | | **Total** | **3.24E-03** |

**Methodology**
Note 1: Maximum Anticipated Diesel Throughput is based on the annual projected throughput provided by the source. The projected off road fuel throughput, which is stored in Diesel Tank 2, is 68,341 gallons/year. A 20% safety factor was used, since this is the projected throughput.
*Emission Factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids (dated 6/08), Tables 5.2-5 and 5.2-6, for diesel at a temperature of 16°C (60°F).
PTE of VOC (tons/yr) = [Maximum Anticipated Diesel Throughput (gallon/yr)] * [Emission Factor (lb/kgal)] * [kgal/1000 gallons] * [ton/2000 lb]
PTE of VOC (tons/yr) = [Diesel Tank Storage Capacity (gallon)] * [Emission Factor (lb/week-kgal)] * [52 weeks/yr] * [kgal/1000 gallons] * [ton/2000 lb]

**Hazardous Air Pollutants (HAPs)**

| | Vapor HAP Content (% by weight)* | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Product | Benzene | Ethylbenzene | n-Hexane | Toluene | Total Xylenes | Total HAPs | PTE of Total HAPs (tons/yr) | PTE of Highest Single HAP (tons/yr) | Highest Single HAP |
| Diesel (Distillate Fuel Oil No. 2) | 0.21% | 0.31% | 0.04% | 2.36% | 5.79% | 8.71% | 0.000 | 0.000 | Xylene |
| | | | | | | **Totals** | **2.82E-04** | **1.88E-04** | **Xylene** |

**Methodology**
*Vapor HAP content (% by weight) data are from TANKS (Version 4.0.9d) partial speciation profiles based on standard ambient temperature (25°C / 77°F).
PTE of Total HAPs (tons/yr) = [Total HAP Content (% by weight)] * [PTE of VOC (tons/yr)]
PTE of Worst Single HAP (tons/yr) = [Worst Single HAP Content (% by weight)] * [PTE of VOC (tons/yr)]

**Abbreviations**
PTE = Potential to Emit
VOC = Volatile Organic Compounds
HAP = Hazardous Air Pollutant

**Appendix A: Emissions Calculations**
**Fugitive Particulate Emissions from**
**Wind Erosion of Material Storage Piles**

**Company Name:** **CW Recycling**
**Source Address:** **2105 Enterprise Park Place, Indianapolis, IN 46218**
**Permit Number:** **M097-50167-00973**
**Reviewer:** **Sarah Germann**

The following calculations determine the amount of fugitive particulate emissions created by wind erosion of material storage piles, based on 8,760 hours of use and USEPA's AP 42 (Pre 1983 Edition), Section 11.2.3 emission factor methodology.

EF = 1.7 * (s/1.5) * ((365-p)/235) * (f/15)
where EF = Uncontrolled emission factor (lb/acre/day) for total suspended particulates (TSP)
s = silt content of material (% by weight)
p = 125 = number of days with greater than or equal to 0.01 inches of precipitation per year
f = 15 = % of time that the unobstructed wind speed exceeds 12 mph at the mean pile height

| Material | Silt Content of Material (wt %)* | Uncontrolled PM Emission Factor (lb/acre/day)** | Maximum Anticipated Pile Size (acres)[3] | Uncontrolled PTE of PM (tons/yr) | Uncontrolled PTE of PM10 (tons/yr)*** | Uncontrolled PTE of PM2.5 (tons/yr)*** |
|---|---|---|---|---|---|---|
| Woodchip[1] | 2.6 | 3.01 | 0.50 | 0.275 | 0.096 | 0.015 |
| Wood Waste[2] | 1.6 | 1.85 | 0.50 | 0.169 | 0.059 | 0.009 |
| | | | **Totals** | **0.44** | **0.16** | **0.02** |

**Notes**
[1]Emission calculations for sand piles were used to represent emissions from the partially enclosed woodchip pile.
[2]Emission calculations for gravel piles were used to represent emissions from the outdoor wood rejected recycled wood waste pile.
[3]Source reportated that the maximum size of the pile is 20 feet x 20 feet x 10 feet. The surface area of a cuboid this size would be 2000 square feet, which is almost 0.5 acres.

**Methodology**
*Silt content values obtained from AP 42 Section 13.2.4 (dated 11/2006) Table 13.2.4-1 (dated 11/2006)
**PM emissions assumed equal to total suspended particulate (TSP) emissions.
***Based on the aerodynamic particle size multiplier values for PM10 and PM2.5 from AP 42 Section 13.2.4 (dated 11/2006) for Aggregate Handling and Storage Piles, PM10 and PM2.5 emissions were calculated as follows:
PM10 emissions = 0.35 * PM emissions
PM2.5 emissions = 0.053 * PM emissions
Uncontrolled PTE of PM (tons/yr) = [Emission Factor (lb/acre/day)] * [Maximum Pile Size (acres)] * (ton/2000 lbs) * (365 days/yr)
Uncontrolled PTE of PM10 (tons/yr) = [Uncontrolled PTE of PM (tons/yr)] * 0.35
Uncontrolled PTE of PM2.5 (tons/yr) = [Uncontrolled PTE of PM (tons/yr)] * 0.053

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

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

**Company Name:** CW Recycling
**Source Address:** 2105 Enterprise Park Place, Indianapolis, IN 46218
**Permit Number:** M097-50167-00973
**Reviewer:** Sarah Germann

**Paved Roads at Industrial Site**

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

Vehicle Informtation (provided by source)

| Type | Maximum number of vehicles per day | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight of Loaded Vehicle (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|---|---|---|---|---|---|---|---|---|---|
| Vehicle (entering plant) (one-way trip) | 59.0 | 1.0 | 59.0 | 25.0 | 1475.0 | 325 | 0.062 | 3.6 | 1325.5 |
| Vehicle (leaving plant) (one-way trip) | 59.0 | 1.0 | 59.0 | 16.0 | 944.0 | 450 | 0.085 | 5.0 | 1835.4 |
| | | **Totals** | **118.0** | | **2419.0** | | | **8.7** | **3160.9** |

Average Vehicle Weight Per Trip = 20.5 tons/trip
Average Miles Per Trip = 0.07 miles/trip

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

| | PM | PM10 | PM2.5 | |
|---|---|---|---|---|
| where k = | 0.011 | 0.0022 | 0.00054 | lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1) |
| W = | 20.5 | 20.5 | 20.5 | tons = average vehicle weight |
| sL = | 9.7 | 9.7 | 9.7 | g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

| | PM | PM10 | PM2.5 | | |
|---|---|---|---|---|---|
| Unmitigated Emission Factor, Ef = | 1.894 | 0.379 | 0.0930 | lb/mile | |
| Mitigated Emission Factor, Eext = | 1.732 | 0.346 | 0.0850 | lb/mile | |
| Dust Control Efficiency = | 50% | 50% | 50% | (pursuant to control measures outlined in fugitive dust control plan) | Water Truck and Street Sweeper |

| Process | Mitigated PTE of PM (Before Control) (tons/yr) | Mitigated PTE of PM10 (Before Control) (tons/yr) | Mitigated PTE of PM2.5 (Before Control) (tons/yr) | Mitigated PTE of PM (After Control) (tons/yr) | Mitigated PTE of PM10 (After Control) (tons/yr) | Mitigated PTE of PM2.5 (After Control) (tons/yr) |
|---|---|---|---|---|---|---|
| Vehicle (entering plant) (one-way trip) | 1.15 | 0.23 | 0.06 | 0.57 | 0.11 | 0.03 |
| Vehicle (leaving plant) (one-way trip) | 1.59 | 0.32 | 0.08 | 0.79 | 0.16 | 0.04 |
| **Totals** | **2.74** | **0.55** | **0.13** | **1.37** | **0.27** | **0.07** |

**Methodology**

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

**Abbreviations**

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

**Appendix A: Emission Calculations**
**Fugitive Dust Emissions - Unpaved Roads**

**Company Name:** CW Recycling
**Source Address:** 2105 Enterprise Park Place, Indianapolis, IN 46218
**Permit Number:** M097-50167-00973
**Reviewer:** Sarah Germann

**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)

| Type | Maximum number of vehicles | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight of Loaded Vehicle (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|---|---|---|---|---|---|---|---|---|---|
| Vehicle (entering plant) (one-way trip) | 20.0 | 1.0 | 20.0 | 20.0 | 400.0 | 550 | 0.104 | 2.1 | 760.4 |
| Vehicle (leaving plant) (one-way trip) | 20.0 | 1.0 | 20.0 | 20.0 | 400.0 | 550 | 0.104 | 2.1 | 760.4 |
| | | **Totals** | **40.0** | | **800.0** | | | **4.2** | **1520.8** |

Average Vehicle Weight Per Trip = 20.0 tons/trip
Average Miles Per Trip = 0.10 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

| | PM | PM10 | PM2.5 | |
|---|---|---|---|---|
| where k = | 4.9 | 1.5 | 0.15 | lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads) |
| s = | 6.0 | 6.0 | 6.0 | % = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production) |
| a = | 0.7 | 0.9 | 0.9 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |
| W = | 20.0 | 20.0 | 20.0 | tons = average vehicle weight |
| b = | 0.45 | 0.45 | 0.45 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

| | PM | PM10 | PM2.5 | |
|---|---|---|---|---|
| Unmitigated Emission Factor, Ef = | 7.08 | 1.89 | 0.19 | lb/mile |
| Mitigated Emission Factor, Eext = | 4.66 | 1.24 | 0.12 | lb/mile |
| Dust Control Efficiency = | 0% | 0% | 0% | (pursuant to control measures outlined in fugitive dust control plan) |

| Process | Mitigated PTE of PM (Before Control) (tons/yr) | Mitigated PTE of PM10 (Before Control) (tons/yr) | Mitigated PTE of PM2.5 (Before Control) (tons/yr) | Mitigated PTE of PM (After Control) (tons/yr) | Mitigated PTE of PM10 (After Control) (tons/yr) | Mitigated PTE of PM2.5 (After Control) (tons/yr) |
|---|---|---|---|---|---|---|
| Vehicle (entering plant) (one-way trip) | 1.77 | 0.47 | 0.05 | 1.77 | 0.47 | 0.05 |
| Vehicle (leaving plant) (one-way trip) | 1.77 | 0.47 | 0.05 | 1.77 | 0.47 | 0.05 |
| **Totals** | **3.54** | **0.94** | **0.09** | **3.54** | **0.94** | **0.09** |

**Methodology**

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

**Abbreviations**

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

**Mike Braun**
*Governor*

**Clint Woods**
*Commissioner*

November 23, 2026

Doug Croft
CW Recycling
2105 Enterprise Park Pl
Indianapolis, IN 46218

Re: Public Notice
CW Recycling
Permit Level: MSOP New Source Construction (Minor PSD/EO)
Permit Number: 097-50167-00973

Dear Doug Croft:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at**:

**IDEM's online searchable database:** https://www.in.gov/apps/idem/caats/ . Choose Search Option **by Permit Number**, then enter permit 50167

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC) located at https://www.in.gov/idem/legal/public-records/virtual-file-cabinet/. Once you have accessed VFC, you will then have the option to search for source related documents using a variety of criteria. To find documents related to this air permit, click on "Advanced Search," specify "OAQ" in the Program search field, specify the five-digit permit number 50167 in the Permit # search field, then click the Search button at the top or bottom of the webpage.

If you have requested to receive a hard copy of these documents, the preliminary findings are enclosed.

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/public-notices/

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 Indianapolis Public Library- Martindale-Brightwood Branch, 2434 N Sherman Dr in Indianapolis, IN 46218. 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 draft permit 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 Germann, Sarah, Indiana Department of Environmental Management, Office of Air Quality, Indiana Government Center North, 100 N. Senate Avenue, Room 13W, Indianapolis, Indiana, 46204-2251 or call (800) 451-6027, and ask for extension 4-6555 or dial (317) 234-6555.

Sincerely,

Cheri Mosier

Cheri Mosier
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

**Mike Braun**
*Governor*

**Clint Woods**
*Commissioner*

November 23, 2026

To: Indianapolis Public Library- Martindale-Brightwood Branch

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: CW Recycling**
**Permit Number: 097-50167-00973**

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 Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 1/13/2025

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

**Mike Braun**
*Governor*

**Clint Woods**
*Commissioner*

Notice of Public Comment

**November 23, 2026**
**CW Recycling**
**097-50167-00973**

To: Interested Parties:

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity. The Indiana Department of Environmental Management, Office of Air Quality, invites your comments on the draft air permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at https://www.in.gov/idem/public-notices/.

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

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

**Please Note:** *If you would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN Interested Parties Cover Letter 1/13/2025

Visit on.IN.gov/survey or scan the QR code to provide feedback.
*We appreciate your input!*

# Mail Code 61-53

| IDEM Staff | CMOSIER 11/23/2026<br>CW Recycling 097-50167-00973 (draft) (2nd PN) | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
|---|---|---|---|
| Name and address of Sender | ▶ | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br>**CERTIFICATE OF MAILING ONLY** |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee<br>Remarks |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | Doug Croft CW Recycling 2105 Enterprise Park Pl Indianapolis IN 46218 (Source CAATS) | | | | | | | | | |
| 2 | | Indpls City Council/Mayor/Sustainability ++ 200 E Washington St, City-County Bldg, Ste 2501 Indianapolis IN 46204 *(Local Official)* | | | | | | | | | |
| 3 | | Marion County Commissioners ++ 200 E Washington St, City-County Bldg, Ste 801 Indianapolis IN 46204 *(Local Official)* | | | | | | | | | |
| 4 | | Indianapolis Public Library- Martindale-Brightwood 2434 N Sherman Dr Indianapolis IN 46218 *(Library)* | | | | | | | | | |
| 5 | | Indpls Planning Div, Metropolitan Development ++ 200 E Washington St Rm 2042 Indianapolis IN 46204 *(Local Official)* | | | | | | | | | |
| 6 | | Marion County Health Department 3901 Meadows Dr. Indianapolis IN 46205 *(Health Department)* | | | | | | | | | |
| 7 | | Mr. Richard Thomas 13431 Spotswood Street Carmel IN 46021 *(Affected Party)* | | | | | | | | | |
| 8 | | Indiana Medical Staffing 621 S Taft Ave Indianapolis IN 46241 *(Affected Party)* | | | | | | | | | |
| 9 | | Mat Hollinger Foresight 880 Lennox Ct Zionsville IN 46077 *(Consultant)* | | | | | | | | | |
| 10 | | JMDH Real Estate of Indianapolis LLC 1710 Whitestone Expressway Whitestone NY 11357 *(Affected Party)* | | | | | | | | | |
| 11 | | Hillside Industrial IN LP 121 W Long Lake Rd Ste 250 Bloomfield Hills MI 48304 *(Affected Party)* | | | | | | | | | |
| 12 | | Jaguar Prince LLC 2153 Hillside Ave Indianapolis IN 46218 *(Affected Party)* | | | | | | | | | |
| 13 | | 2G LLC PO Box 4737 Evansville IN 47724 (Affected Party) | | | | | | | | | |
| 14 | | DS Vision Direct LLC 2222 Enterprise Park Pl Indianapollis IN 46218 *(Affected Party)* | | | | | | | | | |
| 15 | | | | | | | | | | | |

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